

**IN THE COURT OF APPEALS OF THE STATE OF NEVADA**

**\* \* \***

ADAM MICHAEL SOLINGER, )  
 )  
 Appellant, )  
 )  
 vs. )  
 )  
 CHALESE MARIE SOLINGER, )  
 )  
 Respondent. )  
 )  
 \_\_\_\_\_ )

Case No.: 84832-COA

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**APPELLANT’S APPENDIX  
VOLUME 8**

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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*  
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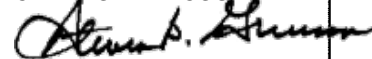
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06/02/2021	Reply To Opposition To Motion To Disqualify And Opposition To Countermotion For Fees And Sanctions	14	3054 - 3069
01/04/2021	Reply To Opposition To Motion To Terminate Temporary Spousal Support And Opposition To Countermotion	12	2754 - 2765
11/09/2020	Reply To Opposition To Plaintiff's Motion To Clarify Court's June 30th Order After Hearing	12	2695 - 2702
08/05/2020	Reply To Plaintiff's Non-Opposition To Defendant's Motion To Continue Trial And Opposition To Plaintiff's Countermotion For Sanctions	11	2544 - 2552
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03/30/2020	Supplemental Appendix Of Exhibits In Support Of Plaintiff's Reply In Support Of Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Partial Opposition To Countermotion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	9	1919 - 1959
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1 **NEOJ**  
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10 Attorney for Joshua Lloyd

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

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

18 Case No. **D-19-582245-D**  
19 Dept. No. **I**

20 **DISCOVERY COMMISSIONER**

21 Date of Hearing: **December 6, 2019**  
22 Time of Hearing: **1:00 p.m.**

23 **NOTICE OF ENTRY OF ORDER**

24 YOU WILL PLEASE TAKE NOTICE that a “**Order on Discovery**  
25 **Commissioner’s Report and Recommendations**” was entered in the above-  
26 captioned case on the **22<sup>nd</sup>** day of **January, 2020**, by filing a copy with the Clerk.

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A true and correct copy of said Order is attached hereto and made a part thereof.

**DATED** this 22<sup>nd</sup> day of January, 2020.

THRONE & HAUSER



**Dawn R. Throne, Esq.**  
Nevada Bar No. 006145  
1070 W. Horizon Ridge Pkwy., Suite 100  
Henderson, Nevada 89012  
(702) 800-3580  
Attorney for Joshua Lloyd

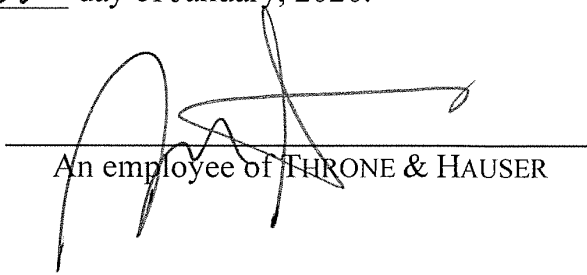
**CERTIFICATE OF SERVICE**

A COPY OF "Notice of Entry of Order" in the above-captioned matter was served this date via electronic service, Pursuant to NEFCR 9 as follows:

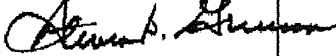
Vincent Mayo, Esq.  
VMGroup@TheAbramsLawFirm.com  
Attorney for Plaintiff

Bruce Shapiro, Esq.  
Admin@pecoslawgroup.com  
Attorney for Defendant

**DATED** this 22 day of January, 2020.



An employee of THRONE & HAUSER



1 **ORDR**  
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  
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9 Phone: (702) 800-3580  
10 Fax: (702) 800-3581 Facsimile  
11 email: dawn@thronehauser.com  
12 Counsel for Joshua Lloyd

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**ADAM MICHAEL SOLINGER,**  
  
Plaintiff  
  
vs.  
  
**CHALESE MARIE SOLINGER,**  
  
Defendant

Case No. **D-19-582245-D**  
Dept. No. **I**  
  
Date of Hearing: **December 6, 2019**  
Time of Hearing: **1:00 p.m.**

**Discovery Commissioner**

**ORDER ON DISCOVERY COMMISSIONER'S  
REPORT AND RECOMMENDATIONS**

The Court, having reviewed the attached report and recommendations prepared  
by the Discovery Commissioner and,

No timely objection having been filed,

After Reviewing the objections to the Report and Recommendations and good  
cause appearing,

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AND

X **IT IS HEREBY ORDERED** that the Discovery Commissioner's Report and Recommendations are affirmed and adopted.


\_\_\_ **IT IS HEREBY ORDERED** that the Discovery Commissioner's Report and Recommendations are affirmed and adopted as modified in the following manner. (attached hereto)

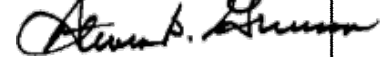
\_\_\_ **IT IS HEREBY ORDERED** this matter is remanded to the Discovery Commissioner for reconsideration or further action.

\_\_\_ **IT IS HEREBY ORDERED** that the Discovery Commissioner's Report and Recommendations are reversed.

\_\_\_ **IT IS HEREBY ORDERED** that a hearing on the Discovery Commissioner's Report is set for \_\_\_ day of \_\_\_, 2019, at \_\_\_ : \_\_\_ .m.

DATED this 16<sup>th</sup> day of January 2020

  
\_\_\_\_\_  
DISTRICT COURT JUDGE *CB*  
CHERYL B. MOSS



1 **WOA**  
2 **Dawn R. Throne, Esq.**  
3 Nevada Bar No. 006145  
4 **THRONE & HAUSER**  
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10 Attorney for Joshua Lloyd

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

13 **ADAM MICHAEL SOLINGER,**

14 Plaintiff,

15 vs.

16 **CHALESE MARIE SOLINGER,**

17 Defendant.

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

19 Dept. No. **I**

20 **NOTICE OF WITHDRAWAL OF ATTORNEY OF RECORD**

21 **NOTICE IS HEREBY GIVEN**, pursuant to Supreme Court Rule 46, that  
22 **Dawn R. Throne, Esq.**, of the law office of **THRONE & HAUSER**, has completed all  
23 matters that she was retained for regarding Joshua Lloyd's case. Ms. Throne, counsel  
24 for Joshua Lloyd, withdraws from further representation of Mr. Lloyd. Accordingly,  
25 all future pleadings, notices, orders and any other papers or correspondence in this  
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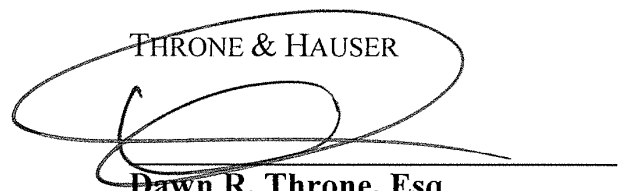
matter must be served on Mr. Lloyd in Proper Person, at his last known address, to

wit:

Joshua Lloyd  
4657 Curdsen Way  
Las Vegas, NV 89110

DATED this 23<sup>rd</sup> day of January 2020.

THRONE & HAUSER



**Dawn R. Throne, Esq.**  
Nevada Bar No. 006145  
1070 W. Horizon Ridge Pkwy, Suite 100  
Henderson, Nevada 89012  
(702) 800-3580  
Attorney for Joshua Lloyd

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**CERTIFICATE OF MAILING**

A COPY OF Counsel's "NOTICE OF WITHDRAWAL OF ATTORNEY OF RECORD" in the above-captioned matter was served this date by mailing a true and correct copy thereof, via first class mail, postage prepaid and addressed as follows:

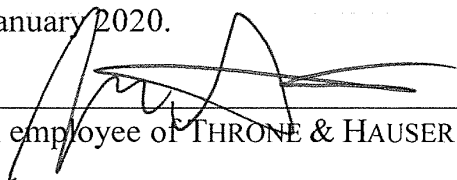
Joshua Lloyd  
4657 Curdsen Way  
Las Vegas, NV 89110

and via electronic service, pursuant to NEFCR 9 as follows:

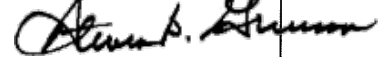
Vincent Mayo, Esq.  
VMGroup@TheAbramsLawFirm.com  
Attorney for Plaintiff

Bruce Shapiro, Esq.  
Admin@pecoslawgroup.com  
Attorney for Defendant

DATED this 23<sup>rd</sup> day of January 2020.

  
\_\_\_\_\_  
An employee of THRONE & HAUSER





1 **RPLY**

Vincent Mayo, Esq.  
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THE ABRAMS & MAYO LAW FIRM  
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4 Tel: (702) 222-4021  
Fax: (702) 248-9750  
5 Email: VMGroup@theabramslawfirm.com  
Attorney for Plaintiff

6 Eighth Judicial District Court  
7 Family Division  
Clark County, Nevada

8 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
9 Plaintiff, ) Department: I  
vs. )  
10 CHALESE MARIE SOLINGER, ) Date of Hearing: 2/24/20  
11 Defendant. ) Time of Hearing: 9:30 a.m.

12  
13 **REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR**  
14 **RECONSIDERATION OF THE COURT'S DECEMBER 9, 2019**  
15 **DECISION; FOR PROOF OF CHALESE'S AUTO INSURANCE**  
16 **FOR THE LAST YEAR; AND RELATED RELIEF; AND**  
17 **OPPOSITION TO DEFENDANT'S COUNTERMOTION TO**  
18 **RESTORE JOINT PHYSICAL CUSTODY AND FOR**  
19 **ATTORNEY'S FEES**

20 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL  
21 SOLINGER, by and through his attorney of record, Vincent Mayo, Esq.,  
of The Abrams & Mayo Law Firm, and hereby submits his *Reply in*  
*Support of Plaintiff's Motion for Reconsideration of the Court's*  
*December 9, 2019 Decision; for Proof of Chalese's Auto Insurance for*

1 *the Last Year; and Related Relief; and Opposition to Defendant's*  
2 *Counter-motion to Restore Joint Physical Custody and for Attorney's*  
3 *Fees. This Reply & Opposition is made and based upon the attached*  
4 *Points and Authorities, the Affidavit of Plaintiff attached hereto, the*  
5 *Appendix of Exhibits in support, all papers and pleadings on file herein,*  
6 *and any oral argument adduced at the hearing of this matter. Note that*  
7 *the income information in Adam's FDF has not changed since last filing.*

8 Dated Wednesday, January 22, 2020.

9 Respectfully Submitted,

10 THE ABRAMS & MAYO LAW FIRM

11 Vincent Mayo, Esq.  
12 Nevada State Bar Number: 8564  
13 6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Attorney for Plaintiff

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **I. INTRODUCTION TO ADAM'S REPLY**

16 Chalese, through her counsel, tries to paint many inaccurate  
17 pictures with a lot of words. This Reply will not address many of her  
18 paintings because they're irrelevant and inflammatory merely for the  
19 sake being so. However, the plain fact of the matter is that at most, a  
20 BFA focusing on Chalese's mental instability is what is warranted in this  
21 matter, not a full custody evaluation. Further, this Court ordered

1 temporary spousal support on the basis that Josh and Chalese broke up  
2 and he moved out. ***To be clear, Chalese and Josh are still***  
3 ***together***, as the facts herein will prove. Finally, there has been no  
4 accounting of \$80,000 in attorney's fees that Chalese received from her  
5 mother. All these points on their own warrant a reconsideration of the  
6 Court's December 9<sup>th</sup> orders.

7 **II. REPLY**

8 **A. THE COURT UNKNOWINGLY RELIED ON**  
9 **CHALESE'S LIE WHEN IT ORDERED SPOUSAL**  
10 **SUPPORT**

11 The Court has to remember how the last hearing went in order to  
12 fully understand the argument for reconsideration pertaining to spousal  
13 support. Chalese argued first with her requests for spousal support,  
14 attorney's fees, and the child custody evaluation. At no point when her  
15 counsel was arguing did he mention or even allude to Chalese and Josh  
16 breaking up and Josh subsequently moving out of the Curdsen residence  
17 that she and Josh own together. ***This is very important as Chalese***  
18 ***no longer having someone living with her and contributing***  
19 ***to her expenses would definitely have been a fact she would***  
20 ***have disclosed right off the bat if true.*** When it was Adam's turn,  
21 his counsel started with Josh's attempted burglary and assault of Adam  
(which was the basis for the no contact order granted by this Court and

1 the TPO granted by Judge Chellini, Las Vegas Justice Court, on January  
2 8, 2020).

3 Chalese's counsel objected to bringing this up, arguing he had no  
4 notice, had not seen the videos, and had not had a chance to talk to his  
5 client before the hearing or over the weekend. Mr. Mayo nevertheless  
6 finished his argument. When Chalese's counsel began his rebuttal, he  
7 did so by suddenly stating that Chalese and Josh had broken up and  
8 Josh had moved out of the house the preceding day. Adam responded  
9 that the timing of Chalese's claim was highly suspicious, especially since  
10 Chalese had sent him a text message just the night before stating she and  
11 Josh were going to the rodeo together.

12 When the Court made its order, it started by representing that it  
13 was not going to award spousal support but based on Chalese's  
14 revelation that she and Josh had broken up, the Court ordered spousal  
15 support. The Court did state that if Adam subsequently learned Chalese  
16 was lying about she and Josh not breaking up / not living together, he  
17 could bring the matter back before the Court. If Chalese was lying, the  
18 Court stated it would reassess its decision and conclude that Chalese has  
19 severe credibility issues.

20 Low and behold, Chalese blatantly lied to the Court since she and  
21 Josh never broke up and he did not move out. The evidence on this is

1 overwhelming. After the hearing, Adam continued seeing Josh's truck  
2 parked at the Curdsen residence during the late night and even during  
3 child exchanges. Suspicious, Adam drove by Curdsen residence twice  
4 late at night and sure enough, Josh's truck was present. Michael, the  
5 parties' son, stated Josh and his son Jesse were present at the Curdsen  
6 residence opening Christmas presents with him and his sister. Chalese  
7 removed Josh from her Facebook profile after the December 9, 2019  
8 hearing, only to update it again on January 12, and 20, 2020 with photos  
9 of she and Josh and the parties' children with Josh's children.<sup>1</sup> Most  
10 telling of all though, Josh admitted under oath at the January 8, 2020  
11 TPO hearing before Judge Chellini, Las Vegas Justice Court (for the TPO  
12 Adam took out against Josh) that Josh was still living with Chalese in  
13 their house which they own together.<sup>2</sup>

14 Josh never stated he and Chalese broke up or that he moved out.  
15 In fact, when the Judge granted Adam's request for a TPO, Josh asked  
16 for a carve-out for the times Adam was at the Curdsen residence for  
17 child exchanges so that Josh would not be in violation of the TPO (as  
18 long as Josh did not come out of the house).<sup>3</sup>

19 ///

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<sup>1</sup> See the 1/12/20 Facebook posts by Chalese, attached as Exhibit 1.

21 <sup>2</sup> See page 16 and 17 of the 1/8/20 TPO hearing transcript, attached as Exhibit 2.

<sup>3</sup> *Id.*

1 Hence, Chalese flat-out lied to the Court on December 9<sup>th</sup> for the  
2 sole reason of trying to get spousal support. Worse, Chalese did so under  
3 oath in her December 13, 2019 Second Supplemental Response to  
4 Adam's Request for Interrogatories when she stated, "***Defendant and***  
5 ***Mr. Lloyd are no longer residing together and have ended***  
6 ***their relationship.***"<sup>4</sup> The Court has been aware for some time that  
7 Chalese is a habitual liar and this bold-faced lie only drives the point  
8 home. But for this lie, the Court stated on December 9<sup>th</sup> that it was ready  
9 to deny Chalese's request. The Court should therefore carry through with  
10 its initial decision and deny temporary spousal support.

11 Worse, Chalese doubled-down when Adam stated in his Motion for  
12 Reconsideration that Chalese and Josh were still living together. Instead  
13 of coming clean, Chalese evaded, stating on page 10 that Adam has not,  
14 "provided proof of same." Chalese had an obligation to reveal that  
15 material fact but refused to.

16 Chalese's counsel's position on this matter is also concerning. The  
17 fact they did not disclose at the beginning of the December 9<sup>th</sup> hearing  
18 that Chalese and Josh had supposedly broken up (when doing so was  
19  
20

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21 <sup>4</sup> See page 11, as well as page 24, of Chalese's 12/13/19 Second Supplemental  
response, attached as Exhibit 3.

1 beneficial to her case), is troubling.<sup>5</sup> However, when Adam’s counsel sent  
2 Chalese’s the no-contact order regarding Josh, Chalese’s counsel, in their  
3 January 8, 2020 letter, made sure the no-contact order was drafted in a  
4 way that created loopholes for Josh.<sup>6</sup> Adam’s counsel responded, stating,  
5 “As you do not represent Josh and Chalese claims he is no longer in her  
6 life, it is unclear why you are spending time and money nit-picking the  
7 details of the No Contact Order.”<sup>7</sup> Chalese’s counsel did not respond.

8 **B. AN ACCOUNTING OF THE \$80,000 CHALESE’S**  
9 **MOTHER GAVE HER FOR ATTORNEY’S FEES**  
10 **SHOULD BE ORDERED BEFORE ANY ADDITIONAL**  
11 **AWARD OF FEES IS EVEN CONSIDERED**

12 The goal with preliminary attorney’s fees is to get the parties on a  
13 level playing field. Looking at the relative amount of attorney’s fees each  
14 party has expended, the parties are on a level playing field. Hence, there  
15 is no need to grant an award of additional attorney’s fees to Chalese. This  
16 is especially true when the Court considers the litigation in this case thus  
17 far has been because of Chalese’s horrible judgment and blatant  
18 misconduct.

19 ///

20 <sup>5</sup> Specifically, Chalese’s counsel represented at the December 9<sup>th</sup> hearing that he was  
21 not ready to address Josh’s criminal behavior because he had no idea it was coming  
and he did not get a chance to talk to this client only to represent to the Court shortly  
thereafter that Chalese and Josh had broken up, that Josh had moved out, and that it  
was a result of Josh’s behavior towards Adam.

<sup>6</sup> See the January 8, 2020 correspondence, attached as Exhibit 4.

<sup>7</sup> See the January 9, 2020 correspondence, attached as Exhibit 5.

1 Further, Chalese stated under oath that she was given \$80,000 by  
2 her mother for attorney's fees. She then stated in Court she did not use it  
3 "all" for attorney's fees and that some of it went towards personal  
4 expenses. When Mr. Mayo asked for clarification as to amounts, Chalese  
5 refused to provide this information. Chalese has subsequently refused to  
6 provide any proof of this nor has she had her counsel provide evidence  
7 regarding how much of the \$80,000 they received. Just like with her lie  
8 regarding she and Josh breaking up, Adam fears Chalese is again lying  
9 and blew most of the \$80,000 on herself instead of her attorney. If not,  
10 how did she go through \$80,000 in just two months?

11 Again, Adam is not a bank and Chalese must be held accountable  
12 for how she spent the money prior to an award for fees being made,  
13 especially since Chalese wants to make Adam half responsible for those  
14 monies. ***It would be unconscionable to allow Chalese to receive***  
15 ***\$80,000 from fees from her mother (which Chalese claims***  
16 ***was a loan and that Adam is half responsible for), blow it on***  
17 ***personal discretionary spending instead of its intended***  
18 ***purpose and then request more fees.*** At any rate, if Chalese had  
19 spent \$80,000 on the Pecos Law Group, \$25,000 on Louis Schneider,  
20 and \$7,500 on the Kainen Law Group, those monies would total over  
21 \$112,000. Any analysis of equal footing must take this information into



1 consideration.

2 **C. AT MOST, A BRIEF FOCUSED ASSESSMENT**  
3 **SHOULD HAVE BEEN ORDERED**

4 Chalese posits what the harm in doing a child custody evaluation is  
5 and even argues that Adam must have been lying when he said Chalese  
6 was mentally ill and addicted to multiple substances. Make no mistake  
7 about it, Adam very much believes those things. However, there is  
8 tremendous harm in doing an unnecessary full custody evaluation. First,  
9 the two very young children will be exposed to a stranger asking invasive  
10 and strange questions that will leave them wondering what is going on.  
11 Second, and as has been briefed ad nauseum, Chalese has severe issues  
12 that bar her from sharing joint physical custody of the children. Adam  
13 has demonstrated these time and time again. This information would be  
14 presented at trial, thereby negating the need for an evaluation  
15 addressing the same evidence.

16 Third, Chalese's insistence on getting an evaluation done is merely  
17 another way to force Adam to spend even more money doing what's best  
18 for the children. As Chalese said recently, she was going to "take [Adam]  
19 for all [he's] worth plus my kids." Chalese is not going to trial because  
20 she believes that she's a fit mother. She's doing it to punish Adam for not  
21 giving up on what he believes is best for the children. She wants to waste

1 money litigating, she wants to take Adam for all he's worth—which is  
2 barely anything at this point—and only then does she want “my kids.”

3 Fourth, Chalese has had multiple mental health experts over the  
4 years. Either she has not been truthful to them or she doesn't like what  
5 they've diagnosed her with. As mentioned in the initial moving papers,  
6 Chalese canceled the deposition of her treating mental health provider.  
7 She has also listed a separate mental health expert. She knows what her  
8 diagnosis is and she's not bringing it up because it's not helpful to her  
9 position. However, even if Chalese's mental health were at issue, a Brief  
10 Focused Assessment would be more helpful and cost less than a full  
11 custody evaluation.

12 Fifth, Chalese tries to claim that if Adam cared about Chalese, he  
13 would want to know what her issues are so she can have them treated.  
14 However, Chalese's horrible judgment, terrible impulse control and  
15 reckless behavior will not change. She has supposedly been under the  
16 care of a counselor, participated in the COPE Class, and completed the  
17 UNLV Co-Parenting course—and still her actions continue to harm the  
18 best interests of the children. Some people just don't change, no matter  
19 what, and Chalese is one of those people.

20 In the end, Chalese's true motivation for wanting a full custody  
21 evaluation is to try and convince an evaluator that she's just fine and that

1 there's no reason she cannot have joint custody of the children. This is  
2 because she knows she only has to be on her best behavior a couple of  
3 times in front of the evaluator.

### 4 **III. INTRODUCTION TO ADAM'S OPPOSITION**

5 Chalese is under the baseless impression that just because she says  
6 something, it must be true. The old adage of "Emphasize the law if it's on  
7 your side, emphasize the facts if they're on your side, or emphasize your  
8 fists on the table if neither of the above is true" comes to mind. For  
9 example, to claim that "Adam performed virtually no parenting during  
10 the parties' marriage," is the most ridiculous misrepresentation ever. If  
11 the children were awake when Adam was home, he was caring for them.  
12 A division of labor only means that Adam could not care for the children  
13 while he was at work. Additionally, Michael was in daycare the moment  
14 he was old enough to be in daycare. When Michael was, Chalese sat on  
15 the couch and binge watched Buffy the Vampire Slayer and other series.  
16 The parties in fact argued over Chalese not keeping the home clean.

17 As more fully set forth below, Chalese's tactic is to pretend all of  
18 the objective evidence in this case doesn't matter and that Chalese is  
19 actually a decent parent. ***However, the one fact that Chalese***  
20 ***cannot deny is that she did not ask to have joint custody***  
21 ***restored until Adam called her out on it.*** This counter motion is

1 merely a response to Adam pointing that out. Hence, by Chalese's own  
2 inaction, and in addition to her numerous issues addressed herein, she is  
3 still not fit to share joint custody.

4 **IV. OPPOSITION TO CHALESE'S COUNTERMOTION FOR**  
5 **JOINT CUSTODY**

6 Chalese's request to restore joint physical custody must be denied.  
7 There is no doubt that she presents a danger to the children. There is no  
8 conceivable way that this Court can find the best interests of the children  
9 would be restored by returning to joint custody, unless one presents  
10 incorrect and skewed arguments like Chalese does in her countermotion.

11 First and foremost, Chalese's countermotion is nothing more than  
12 the result of being called out in the underlying motion for not having  
13 asked for joint custody to be restored earlier. As Adam argued in his  
14 December 27<sup>th</sup> motion, Chalese conceded that she should not have joint  
15 custody since she has not even asked for it. Low and behold, and in  
16 response to being called out on it, Chalese asks for joint custody.

17 It must be remembered though that the Court awarded Adam  
18 primary physical custody at the June 17, 2019 hearing for a specific  
19 reason. The Court did so due to Chalese's horrible judgment, reckless  
20 behavior and neglect of the children's best interests constituting  
21 violations of its orders and "implicate safety risk issues for the

1 children.”<sup>8</sup> Chalese’s reprehensible conduct consisted of:

- 2 • Chalese doing drugs and drinking alcohol while caring for a 3-
- 3 year-old and a 1-year-old;
- 4 • Chalese unilaterally making major health decisions for the
- 5 children;
- 6 • Chalese allowing her boyfriend Josh Lloyd, a man who uses
- 7 drugs and has a horrible driving record, drive the parties’
- 8 children and leaving the children alone with Josh;
- 9 • Chalese driving the minor children while under the effects of
- 10 medications which Chalese admitted bar her from driving;
- 11 • Chalese keeping the marital residence filthy;
- 12 • Chalese barring co-parenting by cursing and insulting Adam in
- 13 communications.

14 To the Court, these risks included Josh’s involvement in Chalese’s  
15 life. Chalese’s credibility issues were also a major issue for the Court.  
16 However, since the June 17, 2019 hearing, Chalese has only grown  
17 worse, with her judgement and behavior threatening the well-being of the  
18 children and interfering with co-parenting:

19 (1) Adam learned in August of 2019 that Chalese removed  
20 Michael from speech therapy back in January 2019, telling Adam it was  
21 because Michael’s speech therapist no longer believed it necessary.  
22 However, in August of 2019, Chalese told Adam that they should get  
23 Michael evaluated through the school district for speech therapy. This  
24 made Adam suspicious, causing him to investigate what happened to  
25 Michael’s original speech therapy. Michael’s therapist confirmed

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<sup>8</sup> See the June 17, 2019 Order.

1 Michael needed to continue with therapy. Adam confronted Chalese, and  
2 Adam confirmed Chalese stopped supposedly because “she did not have  
3 time with the divorce.” Adam immediately took efforts to place Michael  
4 back in therapy but Chalese stalled Michael’s return to speech therapy by  
5 not telling Adam that Michael’s pediatrician needed to see Michael  
6 before he could restart therapy. Even after Michael restarted the  
7 therapy, Chalese has consistently refused to help with speech therapy by  
8 refusing to take Michael to his appointments if they were on her days  
9 and refusing to practice his assigned homework with him.

10 Now, Chalese’s neglect has caused Michael to be diagnosed as  
11 special needs by the Clark County School District because of his speech  
12 delay. He now has an IEP and he will receive speech therapy through the  
13 district based upon how delayed he is. Keep in mind, Michael is not of  
14 school age yet. His delay is so bad, the school is treating him  
15 preemptively.

16 (2) Chalese was caught by Adam’s PI on August 27, 2019  
17 speeding in excess of 100 miles per hour, weaving in and out of traffic  
18 and using her cell phone, all while the children were in her truck with  
19 her.

20 (3) Chalese continues to use drugs in violation of the Court’s  
21 order. Chalese failed to attend drug testing as ordered on August 7, 2019,

1 (4) stating via AppClose that she was not available “for several  
2 days.” The next time Adam asked Chalese to test on September 4, 2019,  
3 Chalese was caught by Adam’s PI going to a smoke shop, buying a detox  
4 kit and taking it home prior to going in for testing. Chalese also admitted  
5 to buying the detox kit at her September 25, 2019 deposition. Chalese  
6 then went back to the smoke shop a second time that same day and  
7 bought additional cleansing products.<sup>9</sup> Under Court rules, Chalese was  
8 presumed to be positive for drugs. Being that Chalese cheats on her tests  
9 or avoids taking them, Adam has not requested additional testing.

10 (5) Chalese has allowed Josh to smoke marijuana around the  
11 parties’ children. Chalese continues to do so with Josh. When Adam was  
12 at the marital residence to pick up his items on July 17, 2019, he  
13 witnessed Josh drunk and high off a joint. Adam took a photo and video  
14 of this and Josh did not deny this fact at the January 8, 2019 TPO  
15 hearing when Adam made the statement. It is of note that when Adam  
16 asked Chalese via AppClose to confirm, she responded with, “What’s  
17 wrong with Josh smoking up outside? Absolutely nothing.” However,  
18 Chalese also stated Josh smokes with the outside door open and Adam  
19 witnessed Josh smoking inside the home while Josh’s children were  
20 present. Ms. Divasio-Watson also testified Josh smokes indoors around

21 \_\_\_\_\_  
<sup>9</sup> See Chalese’s smoke shop receipts from September 4, 2019, attached as Exhibit 6.

1 the children.<sup>10</sup> Chalese also testified during her deposition that Josh  
2 regularly drinks several beers every night.

3 (6) Chalese has continued to bar effective co-parenting with  
4 Adam by cursing and demeaning him, even with a Mutual Behavior in  
5 effect. The AppClose exchanges between the parties regularly include  
6 Chalese stating: “Fuck you” and “screw you” and referring to Adam as  
7 “mentally fucked”, “a shitty person”; “a vile human being”; and an  
8 “attention seeking snob” to list a few. Adam’s AppClose messages  
9 evidence, as does Chalese’s deposition transcript.

10 Even more unnecessary, Chalese makes fun of Ms. Seller’s weight  
11 by calling her “a whale” and “a cow”, as are evidenced in November 2019  
12 and January 2020 AppClose messages. Josh then added the slight that  
13 Adam should take the treadmill so Ms. Sellers can use same in July of  
14 2019 when Adam and Jessica were moving property out of the former  
15 marital residence. This just further goes to show the Court her  
16 immaturity and how she lets it affect her co-parenting.

17 (7) Chalese has physically threatened Adam. She and Adam were  
18 having an argument over Adam getting into the former martial residence  
19 to retrieve the rest of his property when Chalese grew defensive because  
20 had decided not to let Adam in despite her previous agreement to do the

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21 <sup>10</sup> See the excerpt from the December 2, 2019 transcript, attached as Exhibit 7.



1 same, she told him via AppClose on July 18 2019, "***If you'd like, Josh***  
2 ***can come out there and explain it to you.***"

3 (8) Chalese started taking the children across town shortly  
4 before the time Adam is to pick the children up at the end of Chalese's  
5 visitation period. Chalese has obviously done so in part to force Adam to  
6 drive almost an hour round trip to get the children. For example,  
7 Chalese started doing so on June 21<sup>st</sup> at 6:00 p.m. Chalese took the  
8 children to Josh's sister's house just half an hour prior to Adam's pick-  
9 up time across town from Adam's home, supposedly to swim. However,  
10 she did so not long before Adam was set to pick the children up. Michael  
11 was upset as he had little time to actually swim. Adam told Chalese this  
12 upset Michael and her decision to commit to having Michael swim right  
13 before Adam was to pick him made Adam look bad. Chalese was  
14 indifferent. Then on July 3<sup>rd</sup>, Chalese took the children to Josh's parent's  
15 house, also across town from Adam's home shortly before Adam was to  
16 get the children. Worse, Chalese told Michael that they were going over  
17 for a sleepover, with Chalese talking up how fun it would be. As a result,  
18 Michael was upset when Adam arrived to pick up the children not long  
19 after they arrived at the house. In fact, Michael was crying and blaming  
20 Adam. Adam again tried addressing this with Chalese, who had no real  
21 response. Chalese admitted to this during her deposition.

1 (9) Chalese has involved little Michael in her twisted  
2 gameplaying in violation of EDCR 5.301. On July 14<sup>th</sup>, Michael told  
3 Adam that “mommy said you are mean to her.” Adam was shocked by  
4 Michael’s statement. Michael said this again to Adam while they were in  
5 the car on August 27<sup>th</sup>. Adam pulled over and recorded Michael again  
6 making the statement. Michael has said this so frequently, Adam has  
7 stopped recording it.

8 (10) Chalese stated during her deposition that she only bathes the  
9 children every other day, despite the fact they get dirty every day. Adam  
10 believes that this is indicative of how the children are cared for and why  
11 Marie has such severe diaper rash every single time Adam gets her back.

12 (11) Chalese refuses to participate in the children’s parent teacher  
13 conferences and despite what she says in her filings, she routinely does  
14 not take the children to school.

15 (12) Chalese told the children that Josh’s children are their  
16 brother and sister without first discussing it with Adam.

17 (13) Per the June 17, 2019 hearing, Adam had the minor children  
18 on August 2, 2019 through 6:00 p.m. However, Chalese unilaterally  
19 picked them up from school at 3:38 p.m. Adam told Chalese this was not  
20 acceptable. On top of this, Adam told Chalese that Adam had promised  
21 Michael he would take him swimming after school and now Michael was

1 thinking Adam was lying. In response, Chalese simply stated via  
2 AppClose on August 2, 2019, "Have a good night!", ignoring the fact she  
3 violated the Court's order and Adam's concerns.

4 (14) Chalese has continued claiming Adam owned child  
5 pornography (despite the fact Chalese's expert never found any child  
6 pornography on his electronics), even representing via text in October  
7 2019 to third parties Adam did.<sup>11</sup>

8 (15) Chalese is still with Josh, despite the fact Josh continues to  
9 be a threat to Adam and the minor children. Josh was observed driving  
10 Chalese and the children on several occasions since June 16, 2019,  
11 including more recently on Halloween night (October 31, 2019). Even  
12 though the Court strongly forbade this in the June 17<sup>th</sup> order and  
13 admonished Chalese not to allow it, Chalese did anyway. Worse, Josh  
14 was observed by the PI to drive the children the wrong way against  
15 traffic on a one-way street just to get where he was going faster.

16 The Court had good reason to forbid this, which included Josh's  
17 terrible driving record. Well, Josh is still at it. During her deposition,  
18 Carmen Divasio-Watson, the mother of Jesse, Josh's child, testified that  
19 in November 2019 she witnessed Josh having a large container of  
20 marijuana, a loaded a marijuana pipe and a lighter in the center consol

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21 <sup>11</sup> See the October 2, 2019 texts from Chalese, attached as Exhibit 8.

1 of his truck during the exchange of their child.<sup>12</sup>

2 (16) Josh has extorted Adam, telling him via text message from  
3 May 12, 2019 to “back off” or else he would tell Adam’s significant other  
4 that Adam supposedly has child pornography.

5 (17) Josh wrote a negative review on Adam’s firm website on July  
6 2, 2019, which had nothing to do with Adam’s skills as an attorney.  
7 Rather, Josh complains that Adam is supposedly harassing him and  
8 Chalese and that Adam is involved in “childish bs.” Josh’s review was  
9 completely inappropriate and intended to get Adam into trouble with the  
10 firm’s partners. Adam tried to speak to Chalese about the review.  
11 Chalese first claimed to have no knowledge of the review. She then  
12 claimed Josh left the review because Adam was “harassing” Josh  
13 although, when questioned, Chalese could not come up with a single  
14 harassing act on Adam’s behalf. Finally, Chalese stated that Josh would  
15 remove the review if Adam left him out of the litigation: “**Stop**  
16 **bringing him up and into this and he’ll take it down.**”

17 (18) Josh has physically threatened Adam a number of times since  
18 June 17<sup>th</sup>. The first was while Adam and Jessica Sellers were at the  
19 former marital residence July of 2019 to help move Adam’s property out.  
20 The parties had a dispute as to whom certain art pieces belonged. Josh

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21 <sup>12</sup> See the photos taken by Ms. Divasio-Watson, attached as Exhibit 9.

1 decided to harass Adam, getting in Adam's and Ms. Sellers' faces and  
2 threatening Adam. Josh was not only high but also drunk, as the video  
3 Adam made of the incident shows. A photo from that day shows Josh,  
4 while threatening Adam, holding a marijuana joint and almost empty  
5 beer bottle in the same hand. Josh also did not deny this during the  
6 January 8<sup>th</sup> TPO hearing. Adam, to his credit, told Josh he was not there  
7 to get into it with him. Josh did not care. Then when Adam and Ms.  
8 Sellers tried to go back into the house to get the remainder of Adam's  
9 items, Chalese locked the door on them, preventing Adam from doing so.

10 (19) Worse, Josh recently tried to attack Adam during a child  
11 exchange. Specifically, Chalese refused to return the children to Adam  
12 on December 6, 2019. When Adam went to Chalese's house, Ms. Sellers  
13 and her minor daughter were in Adam's vehicle. Refusing to provide, the  
14 children, Adam calls the police. Soon afterwards, Josh comes running  
15 down the street and starts yelling at Adam. Josh then tells Adam to get  
16 out of his vehicle and that when he does Josh states, "I will knock you  
17 the fuck out!" and "Kick the shit out of you!" When Adam refuses, Josh  
18 tries to physically open Adam's vehicle door and leans on the glass.

19 Josh then leaves but comes back in his truck a few minutes later.  
20 When he does, he drives the wrong way against traffic and speeds

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1 towards Adam's parked vehicle and slamming the brakes, coming to a  
2 stop just a foot in front of Adam's bumper. Josh later stated he did so to  
3 supposedly "keep Adam from leaving."

4 Adam subsequently filed for a TPO against Adam and the hearing  
5 on the TPO was held on January 8, 2020 before Judge Chellini of Las  
6 Vegas Justice Court. After hearing both sides arguments and watching  
7 Adam's video of the incident, Judge Chellini granted Adam's TPO  
8 against Josh. Judge Chellini even admonished Josh for his behavior. The  
9 incident was also reported to the Metropolitan Police and Adam has  
10 been in close contact with the Detective assigned to the matter.

11 Josh has also been making posts in which he demeans Adam and  
12 Ms. Sellers on his Facebook account. Thinking he is being smart, Josh  
13 doesn't include Adam's or Ms. Sellers' names but does include their  
14 initials, i.e. "A.S." (Adam Solinger) and "J.S." (Jessica Sellers). Such  
15 behavior is obviously childish.

16 (20) Josh's threats of violence are not limited to Adam and his  
17 significant other. Michael reported to Adam in November 2019 that Josh  
18 threatened him, stating that he would "whoop his ass." After Michael  
19  
20  
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1 made the comment, Adam quickly pulled out his phone and recorded  
2 Michael when he stated it the second time.<sup>13</sup>

3 (21) Chalese cannot even properly coordinate as to her times and  
4 Adam's times. First, Adam previously asked to swap Chalese's Christmas  
5 Eve for Adam's Christmas Day based on the fact Adam traditionally  
6 preferred Christmas Eve and Chalese Christmas Day. Chalese refused.  
7 Then leading up to Christmas, Chalese brought up the issue of settling  
8 custody and suddenly offered to swap Christmas Eve with Christmas  
9 Day for this year. Adam told Chalese he no longer could as he had  
10 already made plans for Christmas Day given her prior refusals to swap.

11 Then on Christmas Eve, Adam messaged Chalese shortly after  
12 10:00 am using their messenger, AppClose, asked when she would be at  
13 his place to pick up the children. She did not respond at all. Adam had  
14 Christmas Eve plans (a formal event) so as he never heard from Chalese,  
15 he just ended up taking the kids with him. Adam was busy with the event  
16 and the children so he did not check his phone until 9:45 p.m. he saw  
17 that Chalese messaged at 6:15 p.m. through AppClose asking when he  
18 thought the children would get up the next day. She was still not asking

19 \_\_\_\_\_  
20 <sup>13</sup> Chalese will likely try to argue that Josh is a third party and that she has "no  
21 control over him." However, the Behavior Order is intended to make Chalese  
accountable for Josh's conduct as a significant other—and in fact pseudo-husband—as  
said Josh's exposure to the children and Adam is completely within Chalese's  
control. Worse, and despite Chalese knowing her pseudo-husband has a criminal  
past, a drug addiction and propensity towards violent crime, she remains with him.

1 for the children. Chalese next texted at 8:17 pm asking when she would  
2 have FaceTime with the kids. Adam responded that they get up at about  
3 7:00 am and that she could have Facetime with them the next morning.  
4 However, Adam also asked her why she did not come to pick up the  
5 children earlier that day. Chalese gave no answer.

6 Chalese not getting the children on Christmas Eve left Adam  
7 scrambling: He had to get their gifts put together and wrapped (as he  
8 planned to do so earlier on Christmas Eve after Chalese picked up the  
9 children). Adam had to run to the store to get outfits for them because  
10 the Christmas Eve event was formal wear. Adam had to rearrange his  
11 seating for the event and request additional seating. Adam had to cook  
12 prior to going because he hadn't anticipated them being with him and  
13 the menu was seafood (which the children do not like).

14 Then, at 7:15 a.m. Christmas morning, Chalese said that she  
15 thought Adam had Christmas Eve and she had Christmas Day! She then  
16 asked if the children were ready for her. Astonished, Adam asked  
17 Chalese why she would think that given the fact they corresponded via  
18 AppClose and it was clear they were following the Partial Parenting Plan  
19 as Adam was no longer willing to swap days due to his Christmas Day  
20 plans. Despite this, Chalese claimed she would be over to Adam's house  
21 at 10:00 am to get the children and that she was "confused" and "read



1 the order wrong” (even though Adam had previously asked to have them  
2 on Christmas Eve and she literally said no). However, Chalese said  
3 nothing more and never came. Because of this, the children were  
4 extremely confused all day. As a matter of fact, when Chalese finally  
5 talked to them on Christmas Day, the first words out of Michael’s mouth  
6 were why she didn’t pick him up the prior day.

7 Chalese next complained that she did not get the children on  
8 December 26<sup>th</sup> and 27<sup>th</sup> but Adam had notified Chalese back on  
9 December 8<sup>th</sup> via AppClose that he would be exercising vacation time  
10 with the children on those two days. Adam did so as he had family in  
11 town. This was pursuant to the Partial Parenting Plan stating either  
12 party can have vacation time with 14 days advance notice. Per their  
13 AppClose correspondence, Chalese had no issue with this. Hence, Adam  
14 was entitled to the children for those two days.

15 Based on the June 17, 2019 Order, Adam then had the children  
16 through January 3<sup>rd</sup>. Also, he had them for New Year’s Day per the  
17 Partial Parenting Plan as he has the children in odd years. Once again,  
18 Chalese acted confused and stated she wanted the children for some  
19 time on New Year’s. Adam had to again point her to the Partial  
20 Parenting Plan and remind her that they alternated New Year’s on a

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1 yearly basis. Chalese said this was not “fair,” dumbfounding Adam as she  
2 agreed to the Partial Parenting Plan.

3 It is clear that Chalese continues being unable to follow the  
4 custody schedule. Because of this, she frequently threatens to call the  
5 police when she doesn’t get what she wants – even when she is in the  
6 wrong. Chalese withholds the children to try and get what she wants.

7 Hence, Chalese is not fit nor in a position to exercise joint custody  
8 under NRS 125C.0035. The children should continue with the stability  
9 Adam has provided them under the current primary custody order.  
10 Chalese, on the other hand, continues directly and indirectly hurting the  
11 children and put them in harm’s way. Chalese claims the Court awarded  
12 Adam primary custody to punish Chalese but this is not true – it was to  
13 provide the children the security and care Adam has provided based on  
14 Chalese’s horrible judgment and neglect. While the Court can always  
15 reconsider its order if things changed, they obviously have not.

16 The real reason Chalese is asking for joint custody is clear: Money.  
17 Simply put, she realizes that she will lose the motion to reconsider  
18 spousal support because she lied to this Court about she and Josh  
19 terminating their relationship. Losing her argument for spousal support  
20 because of Josh’s contributions, she resorts to the only thing she can to  
21 try to get more money: a countermotion for joint custody. Chalese is

1 fixated on money, not the best interests of the children. Adam, on the  
2 other hand, consistently sacrifices for the best interests of the children.

3 Chalese knows this and knows that she must try and paint Adam in  
4 a bad light, believing doing so will strengthen her argument. Chalese  
5 falsely claims Adam is trying to replace her with Ms. Sellers. Chalese is  
6 twisting Adam's words during his deposition to try and do so. Adam did  
7 not state he wanted Ms. Sellers as the children's mother. What Adam  
8 actually said was that he wants the children to be around people who  
9 care about them, their safety, and their well-being, no matter who that  
10 is. Adam is not trying to replace Chalese and the more she makes the  
11 argument, the more it proves his point that she's making this litigation  
12 about her. Instead, Adam just wants what's best for the children.

13 Chalese is therefore left making half-cocked and untrue  
14 arguments. For example, Chalese argues that Adam has taken vacation  
15 days when he was not permitted to but there is no requirement that  
16 Adam use all of his vacation days at once. Instead, Adam uses his days  
17 around holidays that are important to him or when his parents are in  
18 town to see the children. As additional proof, Adam did so in October  
19 2019 and Chalese had no issue with it. Adam gave Chalese notice he  
20 wanted to have them for December 7-8th for a formal event three  
21 months prior to the dates and Chalese did not oppose it.

1 Chalese states she is worried about her custodial time with the  
2 children and maintaining a relationship with them. If this were true  
3 though, then she should actually take her time with the children instead  
4 of consistently giving it up with no notice to Adam. For example, Chalese  
5 insisted on putting a July 24th holiday in the partial parenting  
6 agreement and she was to get them in 2019 for the same. However, she  
7 did not take them or ask to pick them up during that time. She was  
8 supposed to have them on Black Friday, the day after Thanksgiving, but  
9 she did not take them. Chalese also did not attend the children's  
10 Halloween event like she said she would nor did she take them for  
11 Christmas Eve like she was supposed to.

12 As for a high level of conflict, Counsel completely misrepresents  
13 the messages between the parties hoping that the Court takes him at his  
14 word. Adam raises parenting concerns about the children's hygiene  
15 when they return to him. Examples of this: The fact that Marie has  
16 severe diaper rash every single time she comes back to Adam and the  
17 fact that the Michael frequently reports not bathing and taking naps.  
18 Chalese is also hypocritical: She chastises Adam for not bringing up  
19 parenting issues but then says he's condescending by bringing them up.  
20 Further, at no time does Adam curse at Chalese, demean her or be

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1 otherwise condescending on AppClose. Adam has challenged Chalese to  
2 provide proof of same backing her claim. To date, she has not.

3 Chalese complains being nervous about having a PI on her but  
4 Adam is not. It is because Adam knows he acts in the children's best  
5 interests. In contrast, Chalese is anxious because she keeps getting  
6 caught violating Court orders or endangering the children.

7 Adam does not pick the children up early. Indeed, the children are  
8 in school when they are supposed to be. Adam picks up the kids between  
9 4 p.m. and 4:30 p.m., once all of the learning for the day is done. After  
10 that timeframe, the facility functions as a traditional daycare. Further,  
11 Chalese's pick up time is at 6:00 p.m. and Adam's time runs through  
12 6:00 p.m. When Adam is off of work and wants time with the children  
13 prior to 6:00 p.m., he is entitled to it. What's interesting is that Chalese  
14 is being hypocritical since on January 9, 2020, Chalese did not take  
15 Michael to school just so he could spend the day with her at work. As for  
16 having to drive further, Adam's home is actually one freeway exit sooner  
17 than the daycare and much closer to the freeway Chalese would take to  
18 get to her house if she were taking the shortest route.

19 In regard to young Michael telling Adam things Chalese and Josh  
20 tell him, he is like an overflowing faucet when he is picked up. Like any  
21 parent does, Adam asks Michael how his day. However, when Michael

1 has told Adam things from time to time that Chalese or Josh told him, it  
2 was not coerced by Adam. In fact, Adam has only recorded Michael  
3 when he has said something that was concerning. Also, Adam does not  
4 lead Michael. Instead, he asks him to either repeat what he previously  
5 said or just records what Michael repeats (which small children do).

6       If anyone interrogates the children, it is Chalese. She is the one  
7 during FaceTime calls that asks during nearly every call who picked up  
8 the children, who have they been hanging out with, where Adam is, etc.  
9 Adam, by contrast, is merely absorbing information that Michael  
10 spontaneously utters.

11       In the end, it is Chalese's continuing misconduct and neglect of the  
12 children's best interests that is causing the children hardship, and  
13 emotional turmoil. Adam is the stabilizing force in the children's lives  
14 who continues provide the children care and protection of the children.

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**V. CHALESE IS NOT ENTITLED TO ATTORNEY'S FEES**

Not only is Chalese's counter motion meritless under EDCR 7.60 but she failed to comply with EDCR 5.501. Hence, Chalese has no legal claim for an award of attorney's fees.

**VI. CONCLUSION**

Based on the foregoing, this Honorable Court should grant Adam's Motion and deny the relief requested in Chalese's Counter motion.

Dated Wednesday, January 22, 2020.

Respectfully Submitted,  
  
THE ABRAMS & MAYO LAW FIRM  
  
/s/ Vincent Mayo, Esq.  
Vincent Mayo, Esq.  
Nevada State Bar Number: 8564  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118

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**DECLARATION OF ADAM MICHAEL SOLINGER**

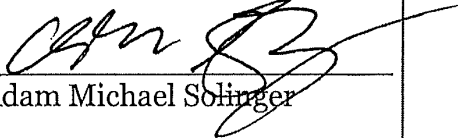
I, Adam Michael Solinger, do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

1. I am the Plaintiff in the above-entitled action, above the age of majority and competent to testify to the facts contained herein and make this sworn Declaration in support in my *Reply in Support of Plaintiff's Motion for Reconsideration of the Court's December 9, 2019 Decision; for Proof of Chalese's Auto Insurance for the Last Year; and Related Relief; and Opposition to Defendant's Countermotion to Restore Joint Physical Custody and for Attorney's Fees.*

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

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

Dated this 23rd day of January, 2020.

  
Adam Michael Solinger



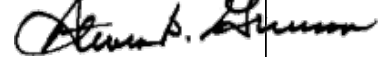
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Reply in Support of Plaintiff's Motion for Reconsideration of the Court's December 9, 2019 Decision; for Proof of Chalese's Auto Insurance for the Last Year; and Related Relief; and Opposition to Defendant's Countermotion to Restore Joint Physical Custody and for Attorney's Fees* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on ~~Wednesday~~, <sup>Thursday,</sup> January ~~22,~~ <sup>23,</sup> 2020. 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



1 **EXH**  
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2 Nevada State Bar Number: 8564  
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5 Email: [vmgroup@theabramslawfirm.com](mailto:vmgroup@theabramslawfirm.com)  
Attorney for Plaintiff

6 Eighth Judicial District Court  
7 Family Division  
Clark County, Nevada

8 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
9 Plaintiff, ) Department: I  
10 vs. )  
11 CHALESE MARIE SOLINGER, ) Date of Hearing: 2/24/20  
12 Defendant. ) Time of Hearing: 9:30 a.m.  
13 )

14 **APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S**  
15 **REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR**  
16 **RECONSIDERATION OF THE COURT'S DECEMBER 9, 2019**  
17 **DECISION; FOR PROOF OF CHALESE'S AUTO INSURANCE**  
18 **FOR THE LAST YEAR; AND RELATED RELIEF; AND**  
**OPPOSITION TO DEFENDANT'S COUNTERMOTION TO**  
**RESTORE JOINT PHYSICAL CUSTODY AND FOR**  
**ATTORNEY'S FEES**

Exhibit	Description
19 1	January 12, 2020 Facebook posts by Chalese
20 2	Pages 16 and 17 of the January 8, 2020 TPO hearing transcript
21 3	Pages 11 and 24 of Chalese's December 13, 2019

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	<i>Second Supplemental Responses</i>
4	January 8, 2020 correspondence
5	January 9, 2020 correspondence
6	Chalese's smoke shop receipts from September 4, 2019
7	Excerpt from the December 2, 2019 transcript
8	October 2, 2019 text messages from Chalese
9	Photos taken by Ms. Divasio-Watson

Dated Wednesday, January 22, 2020.

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 REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION OF THE COURT'S DECEMBER 9, 2019 DECISION; FOR PROOF OF CHALESE'S AUTO INSURANCE FOR THE LAST YEAR; AND RELATED RELIEF; AND OPPOSITION TO DEFENDANT'S COUNTERMOTION TO RESTORE JOINT PHYSICAL CUSTODY AND FOR ATTORNEY'S FEES* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on ~~Wednesday~~, <sup>Thursday,</sup> January ~~22~~, <sup>23</sup>, 2020. 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.

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

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

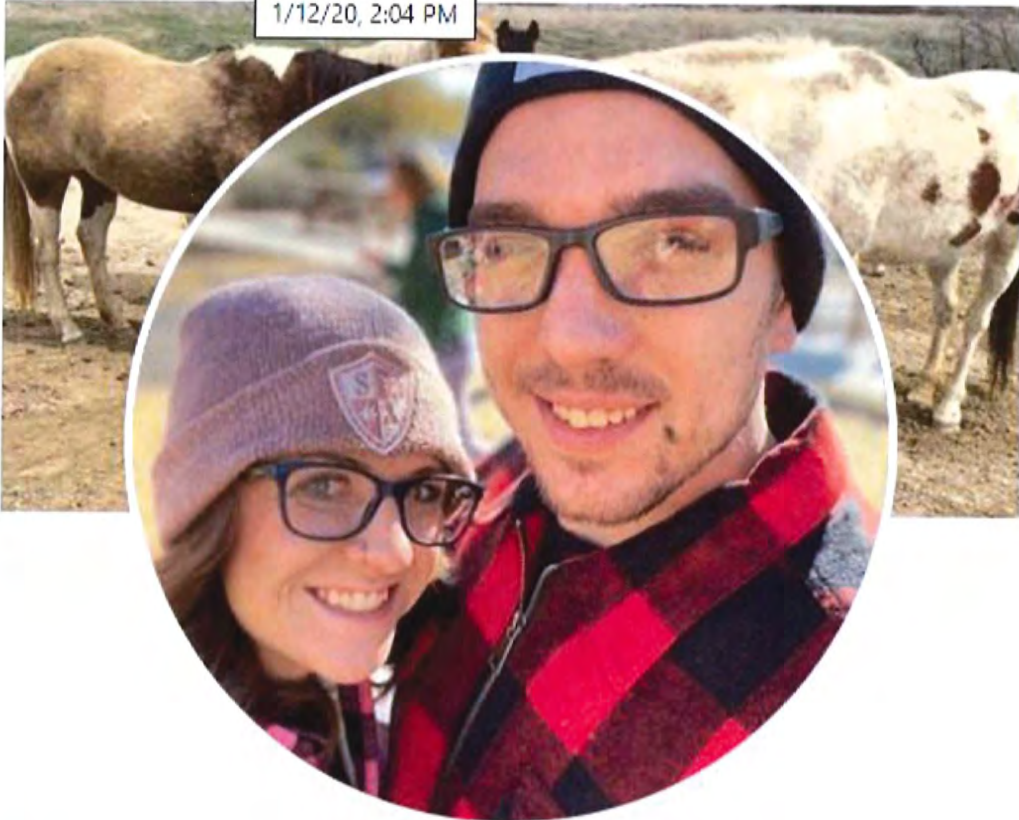


**Chalese Anderson** updated her profile picture.



January 12 at 2:04 PM ·

1/12/20, 2:04 PM



3

Share



 Chalese Anderson  
January 20 

 Share



Chalese Anderson  
January 20



Share



EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

1

1 CASE NO: TPO  
 2 DEPT NO: 14  
 3  
 4 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP  
 5 COUNTY OF CLARK, STATE OF NEVADA  
 6  
 7  
 8 ADAM SOLINGER, )  
 9 Applicant, )  
 10 vs. ) CASE NO. 19PO19992  
 11 JOSHUA LLOYD, )  
 12 Respondent. )  
 13 \_\_\_\_\_ )  
 14  
 15 REPORTER'S TRANSCRIPT  
 16 OF  
 17 TEMPORARY PROTECTIVE ORDER  
 18 BEFORE THE HONORABLE AMY CHELINI  
 19 JUSTICE OF THE PEACE  
 20 Wednesday, January 8, 2020  
 21 10:00 a.m.  
 22  
 23 APPEARANCES:  
 24 For the Applicant ADAM SOLINGER, ESQ.  
 25 For the Respondent: JOSHUA LLOYD  
 PRO PER  
 Reported by: KRISTINE A. FLUKER, CCR NO. 403

3

1 this.  
 2 THE COURT: For the record, Mr. Solinger is  
 3 a defense attorney who has practiced in front of me. I  
 4 don't have any issue whatsoever hearing this. I'm just  
 5 disclosing that because I don't want there to be any  
 6 appearance of impropriety. I've got no issue with -- as  
 7 you know, I didn't realize this was him that was on  
 8 this. Okay?  
 9 So, Mr. Solinger, go ahead and tell me  
 10 what's going on.  
 11 Everybody keep it down.  
 12 MR. SOLINGER: So I'm in the process of  
 13 getting divorced, and as part of that there's custody  
 14 exchanges. At those custody exchanges, Mr. Lloyd has  
 15 frequently caused friction.  
 16 Most recently, about December 6th or so, I  
 17 was there to pick up my kids, pursuant to some vacation  
 18 time I noticed three months prior. My ex-wife denied  
 19 the kids. So I was calling Metro to make a report for a  
 20 standby for purposes of family court proceedings.  
 21 THE COURT: Sure.  
 22 MR. SOLINGER: Mr. Lloyd responds to the  
 23 scene because he wasn't there initially. He comes  
 24 running down the street like a mad man at my truck with  
 25 his camera right there and just starts immediately

2

1 LAS VEGAS, CLARK COUNTY, NEVADA, WED, JAN. 8, 2020  
 2 10:00 A.M.  
 3 PROCEEDINGS  
 4 THE COURT: Adam Solinger vs. Joshua Lloyd,  
 5 Case No. 19PO19992.  
 6 Good morning.  
 7 MR. SOLINGER: Good morning.  
 8 MR. LLOYD: Good morning, ma'am.  
 9 THE COURT: All right. Parties, state your  
 10 names for the record.  
 11 What's your name?  
 12 MR. LLOYD: Joshua Lloyd.  
 13 THE COURT: You're Joshua Lloyd. You go  
 14 over there. You're the adverse party.  
 15 Where's Adam Solinger?  
 16 MR. SOLINGER: Right here, Your Honor.  
 17 THE COURT: You're appearing for him?  
 18 MR. SOLINGER: No, I am him.  
 19 THE COURT: Oh, you are him.  
 20 MR. SOLINGER: Yeah. It's my TPO.  
 21 THE COURT: Oh, it's your TPO. Okay. All  
 22 right. This is from the Las Vegas Defense Group. All  
 23 right.  
 24 Mr. Solinger, I apologize. I'm not used to  
 25 seeing you doing this.  
 MR. SOLINGER: Well, I'm not used to doing

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1 mouthing off.  
 2 He threatens to knock me the fuck out, kick  
 3 the shit out of me. He tries to open up my truck.  
 4 Thankfully it's locked at that point. He keeps talking,  
 5 running off.  
 6 He leaves for three to five minutes or so,  
 7 goes and gets in his vehicle, drives the wrong way  
 8 against traffic, head on at my vehicle, and stops about  
 9 a foot short of my bumper, and then proceeds to get out  
 10 of the car and get right next to my car again until the  
 11 police respond.  
 12 There's been numerous instances where he's  
 13 had conduct like this. He left a bad review on my  
 14 firm's website, saying I'm a terrible attorney, that I'm  
 15 harassing him and his family.  
 16 After that December 6th -- after that  
 17 December 6th incident, I went to family court, and as  
 18 part of that, Judge Moss issued a no-contact order  
 19 because she didn't believe she had the authority enter a  
 20 TPO, given that he was a non-party to the case.  
 21 THE COURT: Let's stop there. You started  
 22 getting going and I need to get you both sworn in before  
 23 we do this. I apologize.  
 24 So go ahead and get sworn in. Raise your  
 25 right hands.

<p style="text-align: right;">5</p> <p>1 Whereupon,  2 <u>ADAM SOLINGER AND JOSHUA LLOYD</u>,  3 having been first duly sworn to testify to the truth,  4 the whole truth and nothing but the truth, testified as  5 follows:  6 THE COURT: All right. So go ahead. Why  7 don't you just go ahead and start over. Well, let me  8 ask a question really quick, Mr. Solinger.  9 MR. SOLINGER: Of course.  10 THE COURT: You indicated that you have this  11 on tape or on your phone. It's recorded?  12 MR. SOLINGER: Correct.  13 THE COURT: All right. Where were the kids  14 when this was happening?  15 MR. SOLINGER: So my minor children were in  16 my ex-wife's house at that point. I was with my  17 girlfriend and her minor 16-year-old child. So I was in  18 the passenger seat of my truck. My girlfriend was  19 driving and her daughter was in the back seat.  20 THE COURT: All right. And I hate to do  21 this to you, but let's start from the beginning because  22 now you're under oath and I don't want there to be any  23 issues.  24 MR. SOLINGER: Of course. I believe it was  25 on or about December 6th, I was going to go pick my kids</p>	<p style="text-align: right;">7</p> <p>1 with Metro, trying to get them to come down. So he  2 leaves and he goes and gets in his truck. He drives the  3 wrong way against traffic, head on at my vehicle that's  4 parked on the side of the road, and stops about a foot  5 short of my bumper.  6 He then gets out of the car and keeps  7 talking until the police arrive. At which point, you  8 know, I give them a statement, he gives a statement, I'm  9 sure, and they take a report.  10 In the months preceding this there's been  11 some instances as well. At one point he wrote a bad  12 review on my firm's website, talking about how I'm  13 harassing him and his family, when I never said anything  14 to him.  15 As part of this case, shortly after this  16 incident that kind of brought us here, I asked Judge  17 Moss to issue a TPO because she's my family law judge.  18 She thought she didn't have the authority to do it, as  19 he's a non-party, so she issued a no-contact order.  20 Then shortly after that, on December 11th,  21 he messaged me at 5:53 p.m. saying, "Does your dad know  22 he raised a pussy? Punk-ass bitch won't even be a man  23 and talk. Nobody wants to beat you up, scary little  24 boy. I was trying to have a conversation with you as a  25 man, but your dad failed to raise one."</p>
<p style="text-align: right;">6</p> <p>1 as part of a custody exchange. It was not my normal  2 custody time, but I had noticed some vacation time  3 pursuant to a partial parenting agreement we had reached  4 three months prior.  5 So I was there. I had let her know the day  6 before. I'd let her know that I was there. She said I  7 wasn't going to get the kids and to just leave. I went  8 around the corner because at that point I wanted to take  9 a report regarding withholding for purposes of the  10 family law case.  11 THE COURT: Sure.  12 MR. SOLINGER: Shortly thereafter,  13 Mr. Lloyd, who was not present at the residence when I  14 tried to get my children, came running down the street  15 at my truck, pulled his phone out, and immediately he  16 started talking and he said, "I'll knock you the fuck  17 out. I'll beat the shit out of you," things to that  18 nature.  19 And then at one point he actually tries to  20 open my vehicle you can hear it click in the vehicle.  21 And Metro took a report for an attempt auto burglary for  22 that, but I don't know if anything has been done with it  23 at this point.  24 He keeps kind of running his mouth, and then  25 at that point I think he realizes that I'm on the phone</p>	<p style="text-align: right;">8</p> <p>1 THE COURT: When was that?  2 MR. SOLINGER: This was December 11th, after  3 the no-contact order had been issued by Judge Moss.  4 THE COURT: And this incident with the truck  5 was December 7th?  6 MR. SOLINGER: Yes. So in July there was  7 also another incident where I was getting some of my  8 property out of the former marital residence. My  9 ex-wife had wanted to take some photos of things that I  10 was taking, but, you know, I didn't have to. I didn't  11 want to.  12 I had been packing those things for 45  13 minute to an hour, and she wasn't interested at all in  14 being a part of that. So I refused. At which point he  15 got in my face, made similar threats, saying he was  16 going to kick my ass.  17 He had to be restrained by my ex-wife, with  18 his marijuana cigarette and his beer bottle in his hand.  19 And that's also in the video.  20 THE COURT: Okay. Sir, I appreciate you not  21 interrupting, and that's kind of like how we like to do  22 things. Now it's your turn. Go ahead, Mr. Lloyd, and  23 tell me what's going on or what's your response?  24 MR. LLOYD: I've been followed and harassed  25 by Adam Solinger and up to five private investigators,</p>

<p style="text-align: right;">9</p> <p>1 constantly making my life hell.</p> <p>2           There was a protective order granted for the</p> <p>3 harassment against him. This is what I'm recognizing as</p> <p>4 retaliation for that.</p> <p>5           THE COURT: Who issued a protective order?</p> <p>6           MR. LLOYD: Judge Moss.</p> <p>7           THE COURT: Did Judge Moss issue a</p> <p>8 protective order against you?</p> <p>9           MR. SOLINGER: No, not at all.</p> <p>10          THE COURT: All right. Go ahead.</p> <p>11          MR. LLOYD: That's because I was constantly</p> <p>12 being harassed and called to depositions and made late</p> <p>13 to pick up my daughter.</p> <p>14          He's gotten involved in my custody case with</p> <p>15 my daughter. He's contacted my ex-girlfriend since high</p> <p>16 school, just trying to -- you know, he's abusing his</p> <p>17 power as an attorney. And I said some things out of</p> <p>18 anger. There has not been contact since this issue.</p> <p>19 And --</p> <p>20          THE COURT: What about the text you just</p> <p>21 sent about his dad raising a you-know-what?</p> <p>22          THE DEFENDANT: I was just trying to talk to</p> <p>23 him. And in the video --</p> <p>24          THE COURT: Well, it's kind of hard to have</p> <p>25 a conversation with somebody when you call them the "P"</p>	<p style="text-align: right;">11</p> <p>1 because he's trying to take the kids from her, and she</p> <p>2 has no issues.</p> <p>3           THE COURT: Well, then I'm assuming</p> <p>4 probably, like, you see now it's your girlfriend, right?</p> <p>5           MR. LLOYD: Correct.</p> <p>6           THE COURT: She's upset, you get upset, and</p> <p>7 go at him, right?</p> <p>8           MR. LLOYD: I'm not going to hit him though.</p> <p>9 I said --</p> <p>10          THE COURT: I mean go at him.</p> <p>11          MR. LLOYD: I said some things out of anger</p> <p>12 and I asked him if --</p> <p>13          THE COURT: That's what I'm saying. You get</p> <p>14 upset and then you see her upset and then you react.</p> <p>15          MR. LLOYD: Yeah, when my kids and his kids</p> <p>16 are watching her cry every day because of the things</p> <p>17 that they're going through.</p> <p>18          THE COURT: That's why I don't do family</p> <p>19 law. It's about everybody except the kids, it seems.</p> <p>20          Let me see the phone.</p> <p>21          MR. SOLINGER: May I approach?</p> <p>22          THE COURT: Sure, of course.</p> <p>23          Sir, you can come up, if you want, too.</p> <p>24          MR. LLOYD: In the beginning of the video</p> <p>25 you can hear me say, "I will get the kids personally. I</p>
<p style="text-align: right;">10</p> <p>1 word, right?</p> <p>2           MR. LLOYD: Yeah.</p> <p>3           THE COURT: Well, you can have a</p> <p>4 conversation, but it's probably not going to be a</p> <p>5 productive one, right?</p> <p>6           MR. LLOYD: Correct. There's been multiple</p> <p>7 things. Like I said, he got involved in my custody case</p> <p>8 with my daughter.</p> <p>9           And I have on paper that him and her have an</p> <p>10 agreement. I don't know what kind of agreement he's</p> <p>11 trying to make with her. But there's been quite a few</p> <p>12 things. But, like I said, since this issue, there</p> <p>13 hasn't been any contact.</p> <p>14          THE COURT: What about you chasing down the</p> <p>15 truck, trying to get in his truck, going the wrong way?</p> <p>16          MR. LLOYD: I didn't try and get in his</p> <p>17 truck. I told him in the beginning of the video, if</p> <p>18 you'd like to view it, that if you have the paperwork to</p> <p>19 pick up the children -- she's constantly distraught, you</p> <p>20 know, scared to come out of the house because of what</p> <p>21 he's done so far. So at this point I'm not really</p> <p>22 trying to be involved.</p> <p>23          THE COURT: That's a pretty good idea.</p> <p>24          MR. LLOYD: I've been involved. He's made</p> <p>25 me involved. He's been making the divorce about me</p>	<p style="text-align: right;">12</p> <p>1 will go in there. If you have the paperwork, if you</p> <p>2 want to show me, whatever, I will go in and get the kids</p> <p>3 personally and bring them out to you."</p> <p>4           MR. SOLINGER: This is the first video. If</p> <p>5 you want to hit play.</p> <p>6           MR. LLOYD: There was only one video, so</p> <p>7 something may have been erased out of that.</p> <p>8           (Whereupon, a video was played.)</p> <p>9           MR. LLOYD: I made a phone call to the</p> <p>10 police too as well. That's why I stopped in front of</p> <p>11 his vehicle, to make sure he was present when they</p> <p>12 showed up.</p> <p>13          (Video continues playing.)</p> <p>14          MR. LLOYD: That was me, in an attempt to</p> <p>15 help him get the kids back.</p> <p>16          (Video continues playing.)</p> <p>17          MR. LLOYD: And I was on the phone with</p> <p>18 Metro too as well.</p> <p>19          (Video continues playing.)</p> <p>20          THE COURT: I want to get to the part where</p> <p>21 he comes at the truck.</p> <p>22          MR. SOLINGER: Where he drives at it?</p> <p>23          THE COURT: Yes.</p> <p>24          MR. LLOYD: Yeah, that's where it started.</p> <p>25 That should have been the video that was produced.</p>

13

1 MR. SOLINGER: So if you hit play, his  
 2 daughter was able to get the very tail end of it because  
 3 we weren't --  
 4 MR. LLOYD: That was just me making sure he  
 5 didn't leave the scene while Metro was on the way.  
 6 (Whereupon, a video is played.)  
 7 THE COURT: All right. When is the last  
 8 contact you've had with Mr. Solinger?  
 9 MR. LLOYD: That text message.  
 10 THE COURT: That text message?  
 11 MR. LLOYD: Yes, ma'am.  
 12 THE COURT: When was it written?  
 13 MR. SOLINGER: December 11th.  
 14 THE COURT: December 11th. Okay.  
 15 Sir, you drove up -- I mean, thank God that  
 16 Mr. -- listen, it's clear to me what's going on. This  
 17 isn't about -- it's a divorce, and divorces are nasty  
 18 sometimes. And this one, apparently, clearly is.  
 19 And emotions get high, but you can't drive  
 20 up on someone like that. I mean, you're lucky -- if it  
 21 was anyone -- you're lucky it wasn't someone who had a  
 22 temper, like me, and got out of the car, with a gun.  
 23 MR. LLOYD: My intentions were to make sure  
 24 he didn't leave the scene before Metro had arrived  
 25 there.

14

1 THE COURT: You can't drive the wrong way on  
 2 the street and just damn near hit somebody. I mean, you  
 3 were like this close to hitting him.  
 4 MR. LLOYD: I pulled over onto the side of  
 5 the road. I had no intentions of hitting the vehicle.  
 6 THE COURT: Okay. I get what you're saying.  
 7 And I -- this isn't about -- I mean, between the text  
 8 messages and your conduct on that day, and I understand  
 9 you're saying that there's other stuff that's happened,  
 10 cut I don't have that in front of me. All I have is  
 11 what's in front of me for the TPO. Okay?  
 12 MR. LLOYD: Yes, ma'am.  
 13 THE COURT: You understand what I'm saying?  
 14 MR. LLOYD: Yes, ma'am.  
 15 THE COURT: So this is just -- I'm going to  
 16 grant it for 45 days. Just stay away from him.  
 17 MR. LLOYD: Yes, ma'am.  
 18 THE COURT: That's all you have to do.  
 19 MR. LLOYD: Yes, ma'am.  
 20 THE COURT: Okay? Here's the thing. You  
 21 stay away from him, nothing's going to happen, right?  
 22 MR. LLOYD: Correct. Yes, ma'am.  
 23 THE COURT: But if there's an issue, then he  
 24 calls the police and you could be subject to getting  
 25 arrested now.

15

1 MR. LLOYD: Yes, ma'am.  
 2 THE COURT: So just please stay away from  
 3 him. The issue that's going on between his ex-wife,  
 4 whatever the situation may be, I understand that you're  
 5 protective of her, she's your girlfriend --  
 6 MR. LLOYD: I'm being brought into it. I've  
 7 been deposed and called to trial and all that.  
 8 THE COURT: Well, this doesn't help anyone.  
 9 MR. LLOYD: Understood.  
 10 THE COURT: It doesn't help Mr. Solinger.  
 11 Clearly it's not helping your kids. And it's not going  
 12 to help the situation, period.  
 13 So I'm going to grant it for 45 days. And I  
 14 hope this is the last of it. Now, if there's another  
 15 incident and you feel the need to file something, file  
 16 something. If you feel the need to call the police --  
 17 this is just a piece of paper. You know this?  
 18 MR. SOLINGER: Yes.  
 19 THE COURT: It's not going to do anything  
 20 other than give him the liability. But stay away. And  
 21 it's going to -- I think it will help you as well.  
 22 MR. LLOYD: Absolutely. Like I said, I've  
 23 had private investigators following me. I have pictures  
 24 of the inside of my vehicle, pictures of the inside of  
 25 my house, which I'm not a hundred percent sure is legal

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1 or not. I'm not an attorney. But it's just constantly.  
 2 And that's why she granted the protective order, to keep  
 3 me from missing work, being late to pick up my daughter  
 4 and my kids after school.  
 5 THE COURT: You might want to double check  
 6 that about the protective order because I don't know  
 7 that Judge Moss would have the jurisdiction to do that.  
 8 MR. SOLINGER: To be clear, there is no  
 9 protective order. What had happened is my attorney gave  
 10 the wrong documents to serve on him for a deposition.  
 11 He moved to quash the deposition subpoena on the grounds  
 12 that it was untimely with the discovery cutoffs. And so  
 13 the discovery commissioner said that there would be no  
 14 deposition because of the discovery issue. Not that  
 15 there was a protective order or anything like that.  
 16 Just that there would be no deposition. But the  
 17 discovery cutoff has been moved, so any kind of order  
 18 would be moot.  
 19 THE COURT: All right. Well, here's the one  
 20 thing I want to get clear because right now --  
 21 obviously, Mr. Solinger, you're sharing custody with  
 22 your wife, ex-wife. Is she your ex-wife or still your  
 23 wife?  
 24 MR. SOLINGER: We're still technically  
 25 married.

17

1 THE COURT: Okay. So you're sharing  
2 custody. Are you living with the ex?  
3 MR. LLOYD: Correct. We have a house.  
4 THE COURT: So I'm not going to violate him  
5 -- I don't want games being played where you go to pick  
6 up the kids and he happens to be in the living room, and  
7 you say, oh, now he's violating. You know what I'm  
8 saying?  
9 MR. SOLINGER: No, I understand. As long as  
10 he does not leave the residence while I'm there to pick  
11 up the kids.  
12 THE COURT: Yes. So you will not be in  
13 violation of this TPO, as long as you stay in the  
14 residence when he's doing the pickup.  
15 MR. LLOYD: Absolutely.  
16 THE COURT: I'm assuming you're not going in  
17 the residence?  
18 MR. SOLINGER: Correct. I send a message  
19 from outside, and the kids come out.  
20 THE COURT: Okay. As long as we do that,  
21 because otherwise I can't stand it when stuff is being  
22 done.  
23 MR. LLOYD: Absolutely.  
24 THE COURT: So if you stay inside, that's  
25 fine. If you come outside and you start yelling, the

18

1 cops are going to get called and you're going to get in  
2 trouble.  
3 MR. LLOYD: Things were high. Emotions were  
4 high, you know.  
5 THE COURT: I understand.  
6 MR. LLOYD: She had went -- she had seen him  
7 maybe once in December, but she was without the kids for  
8 two weeks. He dropped them off for less than 24 hours.  
9 And I was, you know watching her cry as he was --  
10 THE COURT: Believe me, you don't have to  
11 explain emotions getting high to me.  
12 MR. LLOYD: That's where a lot of it stems  
13 from.  
14 THE COURT: Believe me, I get it. But I  
15 think this will work out better for everybody. Just  
16 stay in the house.  
17 She's going to make sure she puts that on  
18 the order that you're allowed to be at the residence  
19 during the custody exchange; however, you're not allowed  
20 to come out of the residence. Okay?  
21 MR. LLOYD: Yes, ma'am.  
22 THE COURT: Don't mess around with this.  
23 MR. LLOYD: And does it expire after 45  
24 days?  
25 THE COURT: Well, we're going to have

19

1 another hearing. If there's no other issues, then we'll  
2 be done. If there's other issues, then they can move to  
3 request for me to extend it for a year.  
4 MR. LLOYD: Yes, ma'am.  
5 THE COURT: Actually up to two years.  
6 MR. LLOYD: Yes, ma'am.  
7 THE COURT: Mr. Solinger, Jessica Sellers  
8 and Courtney Sellers, I can't cover them. They don't  
9 live with you. This is just for you.  
10 MR. SOLINGER: Of course.  
11 THE COURT: So it applies to you. So have a  
12 seat we're going to get you the order. She has to make  
13 some changes on it. Okay?  
14 MR. LLOYD: Thank you, ma'am.  
15 THE COURT: I hope everything works out,  
16 Mr. Solinger.  
17 MR. SOLINGER: I appreciate it. Thank you.  
18 -oOo-  
19 ATTEST: FULL, TRUE AND ACCURATE TRANSCRIPT OF  
20 PROCEEDINGS.  
21  
22  
23 /S/Kristine Fluker  
24 \_\_\_\_\_  
25 KRISTINE A. FLUKER, CCR NO. 403

# EXHIBIT 3

# EXHIBIT 3

# EXHIBIT 3

1 INTERROGATORY NO. 8:

2 Please explain your admitted marriage to Josh Lloyd and what you and Mr.  
3 Lloyd's residential plans will be once the marital residence is sold.

4 RESPONSE NO. 8:

5 Defendant recently retained new counsel and was previously unaware of  
6 these discovery requests and will supplement her responses as soon as possible.

7  
8 Objection: This interrogatory is vague and ambiguous as to the term  
9 "admitted marriage" and "residential plans." Without waiving said objections:  
10 Defendant and Josh Lloyd are not married, and they are currently living together  
11 in a home Defendant purchased. Defendant reserves the right to supplement her  
12 response, as discovery is ongoing.

13 **Defendant and Mr. Lloyd are no longer residing together and have**  
14 **ended their relationship.**

15 INTERROGATORY NO. 9:

16 Please specify what you anticipate your necessary monthly expenses will  
17 be post-divorce for each expense, including, but not limited to, payments for  
18 mortgage/rent/HOA, HOI, property tax, utilities (gas, water-power,  
19 sewer,/garbage, etc.), lawn care, pest control, pool service, security, cable,  
20 internet, groceries, dining out, and household supplies, medical and dental  
21 expenses, medical insurance, automobile insurance, registration and maintenance  
22 (repairs, gas, oil, etc.), cell phone, clothing, appearance, dry cleaning,  
23 membership expenses, entertainment, vacations, etc.

24 RESPONSE NO. 9:

25  
26



1 paying a portion of the utilities for the home he shares with Defendant. Defendant  
2 reserves the right to supplement her response, as discovery is ongoing.

3 **Mr. Lloyd was paying the water bill, internet bill, gas bill, and half of**  
4 **the cell phone bill, for a total of approximately \$232.00 monthly. Mr. Lloyd**  
5 **has since left the home and he and Defendant have ended their relationship.**

6 INTERROGATORY NO. 23:  
7

8 If you have been contributing to the payment of expenses for anyone other  
9 than Plaintiff or the minor child since your separation from the Plaintiff, please  
10 list whom you have been contributing payment for, the amount of funds you are  
11 contributing on a monthly basis and the person's address to whom you have been  
12 contributing.

13 RESPONSE NO. 23:

14 Defendant recently retained new counsel and was previously unaware of  
15 these discovery requests and will supplement her responses as soon as possible.

16 Please see Response to Interrogatory No. 22. Defendant reserves the right to  
17 supplement her response, as discovery is ongoing.

18 **Defendant paid the mortgage, electric bill, and half of the cell phone**  
19 **bill, as well as food and other incidentals when she and Mr. Lloyd resided**  
20 **together. As Defendant and Mr. Lloyd are no longer residing together,**  
21 **Defendant is not contributing to the payment of expenses for anyone other**  
22 **than herself and the minor children.**

23 INTERROGATORY NO. 24:  
24  
25  
26

EXHIBIT 4

EXHIBIT 4

EXHIBIT 4

ELECTRONICALLY SERVED  
1/8/2020 3:51 PM

# PECOS LAW GROUP

*A Professional Law Corporation*  
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Curtis R. Rawlings  
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\*Also Licensed in California

Kirby Wells  
Of Counsel

Legal Assistants

Amy Robinson, C.D.F.A.  
Allan Brown, M.B.A.  
Amalia Alvarez Sciscento  
Angela Romero  
Heather Witte  
Susan Peroutka  
Shirley Martinez  
Veronica C. Jarchow

Janine Shapiro, C.P.A., C.D.F.A.  
Office Administrator

January 8, 2020

Via E-Service

**Vincent Mayo, Esq.**

THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118

Re: ***Solinger vs. Solinger*** (D-19-582245-D)

Dear Vince:

We have reviewed your proposed no contact order and reviewed the video from the December 9, 2019 hearing and have the following comments:

1. Page 2, line 1-2: We saw no mention by Judge Moss regarding “through any 3<sup>rd</sup> parties.” Please remove this provision or provide a video citation.
2. Page 2, line 11-14: We saw no mention by Judge Moss regarding Jessica’s place of employment. There are also, obviously, further issues from commanding Josh not to come within 100 yards of the Attorney’s General’s office. Please remove this provision.

...  
...  
...  
...  
...  
...  
...  
...  
...

*Solinger v. Solinger*  
January 8, 2020  
Page 2

3. Page 3, line 6-8: We did not see that Judge Moss did ordered Josh to stay away from the children's medical care providers. This would obviously cause an issue if, for example, Josh uses the same medical care providers for his children. Please remove this provision.

Sincerely,

*/s/ Bruce I. Shapiro, Esq.*

BRUCE I. SHAPIRO, ESQ.

BIS/ase  
cc : Chalese Solinger  
Jack W. Fleeman, Esq.  
Alicia S. Exley, Esq.  
Angela Romero

# EXHIBIT 5

# EXHIBIT 5

# EXHIBIT 5

ELECTRONICALLY SERVED  
1/9/2020 12:30 PM



† 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

Thursday, January 09, 2020

Bruce I. Shapiro, Esq.  
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. Shapiro/ Mr. Fleeman:

I am in receipt of your letter dated January 8, 2020. Judge Moss specifically stated that "There will be a no contact order it will be the same terms as a TPO but it will be a department I order, just copy the language." (video cite 9:00:04). The Temporary Order for Protection specifically includes the following term:

**YOU ARE PROHIBITED**, either directly or through an agent, from contacting, intimidating, using, attempting to use, or threatening the use of physical force, or otherwise interfering in any way with Applicant (**ADAM M SOLINGER**) and/or the following persons: including, but not limited to, in person, by telephone, through the mail, through electronic mail (e-mail), text messaging, facsimile, or through another person;

Accordingly, it is clear that Judge Moss intended for this No Contact Order to include a term regarding 3<sup>rd</sup> parties, especially in light of the fact that Josh has had his step-mother call Adam's place of employment multiple times.

Jessica's place of employment and the children's medical providers are places that Adam frequents. Judge Moss was clear that places Adam frequents should be included in the no contact order. Further, and to the best of our knowledge, Josh does not use the same medical providers for his children as the parties do so this should not be an issue. Additionally, the Court specifically included Jessica in the order. Please see video time index starting at 08:59:16.

///

///

---

† Board Certified Family Law Specialist  
\* Fellow of the American Academy of Matrimonial Lawyers; Admitted in Nevada, California, and Louisiana

Case Number: D-19-582245-D

001725

Thursday, January 09, 2020  
Adam M. Solinger v. Chalese M. Solinger  
Page 2 of 2  
The Abrams & Mayo Law Firm

Finally, as you do not represent Josh and Chalese claims he is no longer in her life, it is unclear why you are spending time and money nit-picking the details of the No Contact Order.

Please let us know as soon as possible.

Sincerely,

THE ABRAMS & MAYO LAW FIRM

*/s/ Vincent Mayo, Esq.*

Vincent Mayo, Esq.

cc: Mr. Adam M. Solinger

001726

EXHIBIT 6

EXHIBIT 6

EXHIBIT 6



SMOKE SHOP GIFTS  
6520 E LAKE MEAD BLVD  
LAS VEGAS, NV 89156  
702-437-1441

09/04/2019 13:38:11  
MID: XXXXXXXXXXXX431 TID: XXXXX911

DEBIT CARD  
DEBIT SALE

Card # XXXXXXXXXXXX2412  
Debit Card Type: 013  
Network: STAR  
Chip Card: US DEBIT  
AID: A0000000980040  
SEQ #: 11  
Batch #: 5  
Trans #: 992  
Approval Code: 471581  
Entry Method: Chip Read  
Mode: Issuer - PIN Verified

SALE AMOUNT \$93.06

Signature Not Required  
CHALESE M SOLINGER  
ALL SALES FINAL  
THANK YOU  
MERCHANT COPY

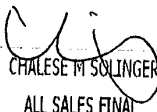
SMOKE SHOP GIFTS  
6520 E LAKE MEAD BLVD  
LAS VEGAS, NV 89156  
702-437-1441

09/04/2019 15:05:59  
MID: XXXXXXXXXXXX431 TID: XXXXX911

CREDIT CARD  
VISA SALE

Card # XXXXXXXXXXXX5952  
Chip Card: VISA CREDIT  
AID: A000000031010  
SEQ #: 13  
Batch #: 5  
Trans #: 4  
Approval Code: 27693D  
TRANS ID: 309247792884184  
Entry Method: Chip Read  
Mode: Issuer  
Tax Amount: \$0.00

SALE AMOUNT \$21.64

X   
CHALESE M SOLINGER  
ALL SALES FINAL  
THANK YOU  
MERCHANT COPY

# EXHIBIT 7

# EXHIBIT 7

# EXHIBIT 7

1 and go, I just scooped handful of everything up and left  
2 with it.

3 Q All right. Can you provide that to us?

4 A Yes.

5 Q Okay. Did Josh ever smoke marijuana around the  
6 kids when you and he were together?

7 A Yes. He's -- he's a steady smoker in the house.

8 Q So he smoked inside the house?

9 A Yes.

10 Q Okay.

11 A He has a bad habit of smoking cigarettes too  
12 around them.

13 But as of --

14 Q So just to make sure, he smoked marijuana inside  
15 the house.

16 A Yes.

17 Q And that's when the kids were there?

18 A Yes.

19 Q All right. Was it in areas where the kids were?

20 A Yes. He'll smoke inside the living room if  
21 they're sitting there.

22 Q Did Kaiden ever come home from Josh's house  
23 talking about child porn?

24 A Yes -- or not child porn.

25 Q Sorry. Porn?

# EXHIBIT 8

# EXHIBIT 8

# EXHIBIT 8



4% 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

Adam Solinger001802

001732



10:19 PM 4% LTE

< 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



12:49 PM

Ok i was like arielle popped what



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





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

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

12:46 PM

C What's that? 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

12:46 PM

C Ok, I won't mention it to him 12:47 PM

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

12:47 PM

+ Enter message





10:19 PM

< Chalese



VIEW ALL



MMS  
11:26 AM



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



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



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







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

EXHIBIT 9

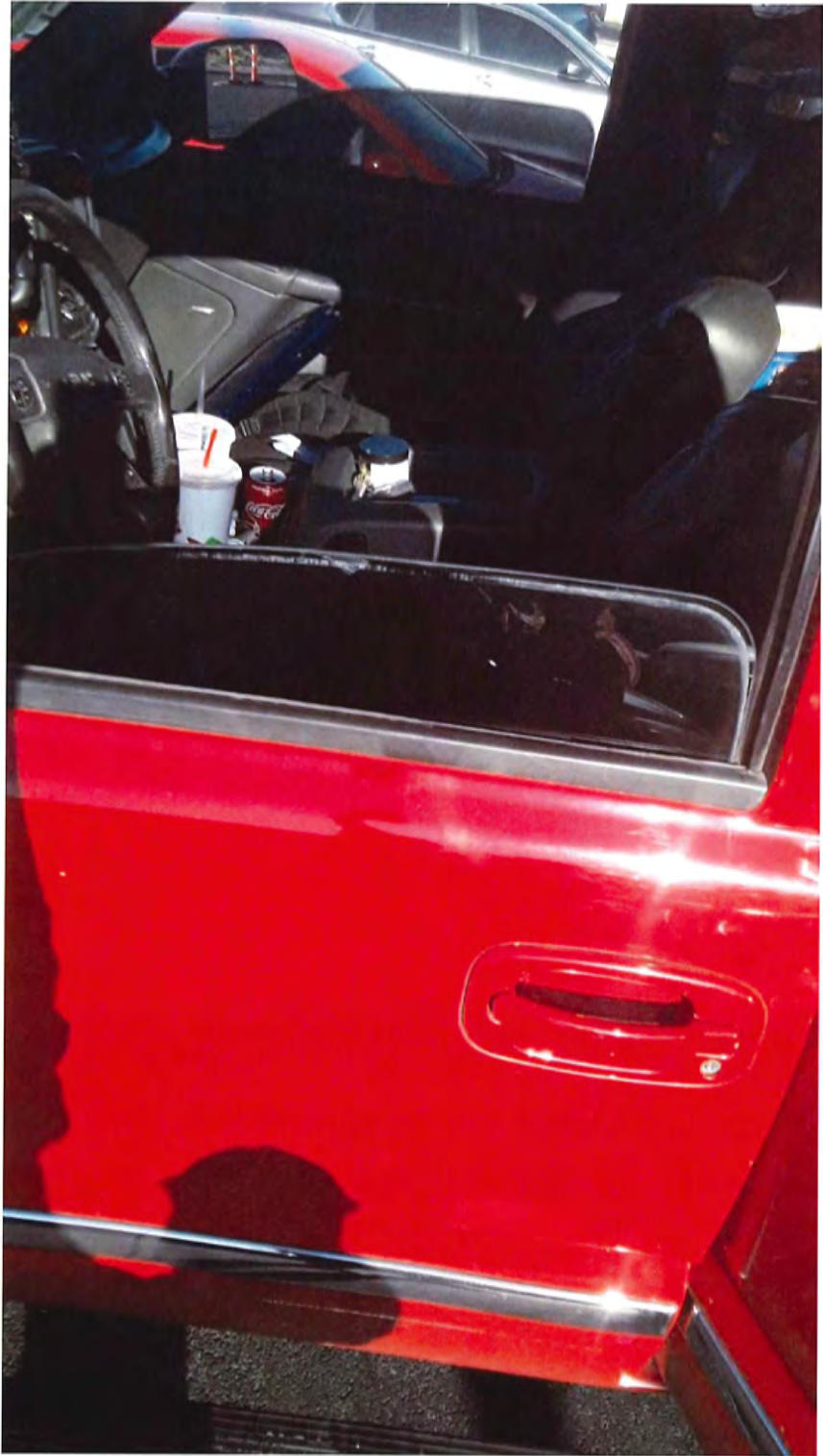
EXHIBIT 9

EXHIBIT 9



Adam Solinger001380

001738

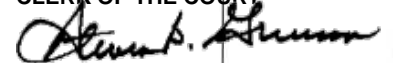


Adam Solinger001379

001739

#2

Electronically Filed  
1/23/2020 2:18 PM  
Steven D. Grierson  
CLERK OF THE COURT



1 **RAR**  
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  
7 Family Division  
Clark County, Nevada

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

12  
13 **REPORT AND RECOMMENDATIONS**

14 This matter coming on for hearing on the 6<sup>th</sup> day of December,  
15 2019, before Discovery Commissioner Holly Fic, upon Plaintiff's *Motion*  
16 *to Compel Discovery Responses and for Attorney's Fees*, Defendant's  
17 *Opposition to Plaintiff's Motion to Compel Discovery Responses and for*  
18 *Attorney's Fees*, and Plaintiff's *Reply in Support of Motion to Compel*  
*Discovery Responses and Attorney's Fees* with Plaintiff, ADAM  
MICHAEL SOLINGER, appearing in person and by and through his  
attorney of record, VINCENT MAYO, ESQ., of THE ABRAMS & MAYO

RECEIVED  
DEC 20 2019  
DISCOVERY

1 LAW FIRM, and Defendant, CHALESE MARIE SOLINGER, appearing  
2 by and through her attorney of record, JACK FLEEMAN, ESQ., OF  
3 PECOS LAW GROUP, and the Court having reviewed the pleadings on  
4 file, heard the arguments of counsel, hereby makes the following  
5 findings and recommendations,

6 **FINDINGS**

7 1. EDCR 5.602 has been met as counsel for Plaintiff has asked  
8 several times for Discovery Responses, including in person.

9 2. It is not Plaintiff's fault that Defendant's first attorney did  
10 not communicate with her regarding discovery. Defendant can do  
11 whatever it is she needs to do with regard to Mr. Schneider.

12 3. Even though the discovery requests were answered, they  
13 were not substantive responses. Therefore, they need to be responded to.

14 4. The argument from Defendant's Counsel that there was no  
15 end date is not persuasive to this Court as Plaintiff's Counsel requested  
16 the documents multiple times and an extension was never requested.

17 **RECOMMENDATIONS**

18 Therefore, the Commissioner recommends as follows:

- 19 1. Plaintiff's Motion to Compel is Granted.  
20 2. Defendant shall complete and do a supplement regarding the  
21 deficiencies, no later than December 13, 2019. Court informed counsels

1 that Discovery is not being re-opened, it is just for the Discovery that has  
2 already been propounded and Defendant needs to respond to /  
3 supplement.

4 3. Parties' counsel shall have an EDCR 5.602 telephone call to  
5 discuss anything that is needed. If Defendant's counsel is working with  
6 Plaintiff's counsel and get the majority of the deficiencies completed and  
7 waiting for one (1) or two (2) documents, counsel is to make sure it is  
8 completed by the return date, December 20, 2019, if anything has to be  
9 discussed.

10 4. Attorney Fees and Costs are granted to Plaintiff. Plaintiff's  
11 counsel shall submit a Memorandum of Fees and Costs and redacted  
12 billing, including language that "the Commissioner having reviewed the  
13 Brunzell Affidavit and redacted invoice, and after considering the factors  
14 in Brunzell v. Golden Gate National Bank, 85 Nev. 345 (1969) attorney  
15 fees in the amount of <sup>3888.50 (HE)</sup> ~~(leave a blank)~~ are awarded."

16 5. Status Check date is set for submission of Report and  
17 Recommendations and deficiency issues. If the Report and  
18 Recommendation is received by December 18, 2019, at 5:00 p.m., no  
19 appearances will be required, and this date will be vacated. Attorney  
20 Mayo shall prepare the Report and Recommendation relative to  
21

1 Plaintiff's Motion to Compel and Attorney Fleeman shall sign as to form  
2 and content.

3 6. Attorney Mayo shall prepare the Report and  
4 Recommendation from today's hearing with regard to the Motion to  
5 Compel and Attorney Fleeman shall review and sign off.

6 7. The Report and Recommendation is due on December 18,  
7 2019, by 5:00 p.m. A Status Check is set for December 20, 2019, at 1:30  
8 p.m. If the Report and Recommendation is received by December 18,  
9 2019, there shall be no need for counsel to appear at the Status Check.

10 Dated this 20<sup>th</sup> day of JANUARY, 2020.

11   
12 DISCOVERY COMMISSIONER


13 Respectfully Submitted:

Approved as to form and content:

14 THE ABRAMS & MAYO LAW  
15 FIRM

PECOS LAW GROUP

16   
17 Vincent Mayo, Esq.  
18 Nevada State Bar Number: 8564  
6252 S. Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
19 Tel: (702) 222-4021  
20 Fax: (702) 248-9750  
Attorney for Plaintiff

 R 14192  
Bruce I. Shapiro, Esq. (4050)  
Jack W. Fleeman, Esq. (10584)  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant



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**NOTICE**

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

Objection time will expire on February 6<sup>th</sup> 2020.

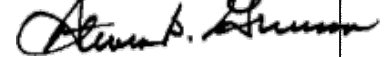
A copy of the foregoing Discovery Commissioner's Report was:

\_\_\_\_\_ Mailed to Plaintiff/Defendant on the \_\_\_ day of \_\_\_\_\_, 20\_\_.

Electronically filed and served counsel on 23<sup>rd</sup> day of January, 2020, pursuant to N.E.F.C.R. Rule 9.

The Commissioner's Report is deemed received at the time it is e-served to a party or the party's attorney. Alternatively, the Commissioner's Report is deemed received three (3) days after mailing to a party or the party's attorney or (3) days after the clerk of the court deposits a copy of the Report in a folder of a party's lawyer in the Clerk's office. E.D.C.R. 2.34(f).

By: Mary Brechon  
COMMISSIONER DESIGNEE



1 MOT  
2 **Bruce I. Shapiro, Esq.**  
3 Nevada Bar No. 4050  
4 **Jack W. Fleeman, Esq.**  
5 Nevada Bar No. 10584  
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](mailto:Bruce@pecoslawgroup.com)  
12 *Attorneys for Defendant*

DISTRICT COURT  
FAMILY DIVISION  
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**

**ORAL ARGUMENT NOT REQUESTED**

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

21 **MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR DEFENDANT**

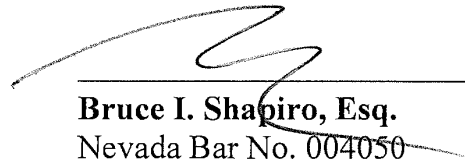
22  
23 COMES NOW **Bruce I. Shapiro, Esq., Jack W. Fleeman, Esq.,** and  
24 PECOS LAW GROUP (collectively "PLG") hereby move this court for an order

1 allowing PLG to withdraw as attorney of record for Defendant **Chalese Marie**  
2 **Solinger.**

3 This Motion is made and based on all the papers and pleadings on file  
4 herein, the Points and Authorities submitted herewith, the affidavit of Bruce I.  
5 Shapiro, Esq., attached hereto, and any further evidence and argument as may be  
6 adduced at the hearing of this matter.

7  
8 DATED this  21  day of January 2020.

9 PECOS LAW GROUP

10 

11 **Bruce I. Shapiro, Esq.**

12 Nevada Bar No. 004050

13 **Jack W. Fleeman, Esq.**

14 Nevada Bar No. 010584

15 PECOS LAW GROUP

16 8925 South Pecos Road, Suite 14A

17 Henderson, Nevada 89074

18 Attorneys for Defendant

1 **POINTS AND AUTHORITIES**

2 EDCR 7.40 states:

3 **Rule 7.40. Appearances; substitutions; withdrawal or change of**  
4 **attorney.**

5 (a) When a party has appeared by counsel, the party cannot  
6 thereafter appear on the party's own behalf in the case without the  
7 consent of the court. Counsel who has appeared for any party must  
8 represent that party in the case and shall be recognized by the court  
and by all parties as having control of the case. The court in its  
discretion may hear a party in open court although the party is  
represented by counsel.

9 (b) Counsel in any case may be changed only:

10 (1) When a new attorney is to be substituted in place of the  
11 attorney withdrawing, by the written consent of both attorneys and the  
client, which must be filed with the court and served upon all parties  
or their attorneys who have appeared in the action, or

12 (2) When no attorney has been retained to replace the  
13 attorney withdrawing, by order of the court, granted upon written  
motion, and

14 (i) If the application is made by the attorney, the attorney  
15 must include in an affidavit the address, or last known address, at  
16 which the client may be served with notice of further proceedings  
17 taken in the case in the event the application for withdrawal is  
granted, and the telephone number, or last known telephone number,  
at which the client may be reached and the attorney must serve a copy  
of the application upon the client and all other parties to the action or  
their attorneys, or

18 (ii) If the application is made by the client, the client must  
19 state in the application the address at which the client may be served  
20 with notice of all further proceedings in the case in the event the  
21 application is granted, and the telephone number, or last known  
22 telephone number, at which the client may be reached and must serve  
a copy of the application upon the client's attorney and all other  
parties to the action or their attorneys.

23 (c) No application for withdrawal or substitution may be granted  
24 if a delay of the trial or of the hearing of any other matter in the case  
would result.

25 Further, Rule of Professional Conduct 1.16 states as follows:

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**Rule 1.16. Declining or Terminating Representation.**

(a) Except as stated in paragraph (c), a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if:

(1) The representation will result in violation of the Rules of Professional Conduct or other law;

(2) The lawyer’s physical or mental condition materially impairs the lawyer’s ability to represent the client; or

(3) The lawyer is discharged.

(b) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if:

(1) Withdrawal can be accomplished without material adverse effect on the interests of the client;

(2) The client persists in a course of action involving the lawyer’s services that the lawyer reasonably believes is criminal or fraudulent;

(3) The client has used the lawyer’s services to perpetrate a crime or fraud;

(4) A client insists upon taking action that the lawyer considers repugnant or with which the lawyer has fundamental disagreement;

(5) The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;

(6) The representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or

(7) Other good cause for withdrawal exists.

(c) A lawyer must comply with applicable law requiring notice to or permission of a tribunal when terminating representation. When ordered to do so by a tribunal, a lawyer shall continue representation notwithstanding good cause for terminating the representation.

(d) Upon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client’s interests, such as giving reasonable notice to the client, allowing time for employment of other counsel, surrendering papers and property to which the client is entitled and refunding any advance payment of fee or expense that has not been earned or incurred. The lawyer may retain papers relating to the client to the extent permitted by other law.

1 PLG and Client have significant disagreements regarding how the case  
2 should proceed, which has resulted in a breakdown of communications. PLG can  
3 no longer represent Client, and it is in Client's best interest that she retain new  
4 counsel. Client may retain new counsel with the \$10,000.00 in fees awarded by  
5 this Court on December 9, 2019, that is subject to reconsideration on February 24,  
6 2020.  
7

8 Less importantly, but nonetheless still relevant, Client is unable to meet the  
9 financial commitments she made when she retained PLG on August 14, 2019.  
10 Fees and costs have far exceeded what PLG or Client expected, because Plaintiff  
11 has unlimited resources and believes he can obtain primary custody by  
12 outspending Client. Client currently has an outstanding balance of more than  
13 \$20,000 and PLG expects client will incur at least an additional \$50,000.00  
14 through trial. The court's award of \$10,000.00 on December 9, 2019, which is  
15 subject to reconsideration on February 24, 2020, is insufficient for PLG to  
16 continue even if there were no serious disagreements on strategy. The \$10,000.00  
17 the court awarded on December 9, 2019, assuming Plaintiff complies with this  
18 order, can be used by Client to retain new counsel.  
19  
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21 ...  
22 ...  
23 ...  
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25 ...

1 In the event this motion is granted, Client can be served at her last known  
2 address: **4657 Curdsen Way, Las Vegas, Nevada 89110; (702) 575-7620.**

3 DATED this 21 day of January, 2020.

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 **AFFIDAVIT OF BRUCE I. SHAPIRO, ESQ.**

16 STATE OF NEVADA )

17 : ss.

18 COUNTY OF CLARK )

19 **Bruce I. Shapiro, Esq.**, first being duly sworn, deposes and says:

20 1. That he is an attorney duly licensed to practice in the State of Nevada  
21 and attorney for Defendant in the above-referenced matter; that Affiant makes this  
22 affidavit in support of his **Motion to Withdraw as Attorney of Record for  
23 Defendant**; that he has personal knowledge of the matters contained in this  
24 affidavit and is competent to testify as to the same.





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CERTIFICATE OF SERVICE

Pursuant to NRCPC 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 27 day of January, 2020, I served a copy of MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR DEFENDANT as follows:

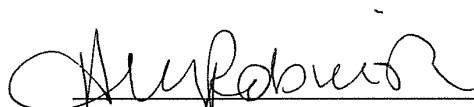
By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada: and/or

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
- Angela Romero angela@pecoslawgroup.com
- Alicia Exley alicia@pecoslawgroup.com
- Bruce Shapiro bruce@pecoslawgroup.com

  
An employee of PECOS LAW GROUP

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam Michael Slinger  
Plaintiff/Petitioner

v. Chalese Marie Slinger  
Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPPOSITION  
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.

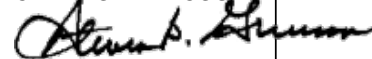
Step 3. Add the filing fees from Step 1 and Step 2.

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: Attorney for Defendant Date 1/27/2020

Signature of Party or Preparer [Signature]



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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

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

13 **EX PARTE MOTION FOR AN ORDER SHORTENING TIME**

14 COMES NOW the Plaintiff, ADAM MICHAEL SOLINGER, by and  
15 through his attorney of record, Vincent Mayo, Esq., of The Abrams & Mayo  
16 Law Firm, and hereby submits this *Ex Parte Motion for an Order Shortening*  
17 *Time* pursuant to EDCR 5.513 regarding Attorney Steinberg's *Motion to*  
18 *Withdraw as Attorney of Record for Defendant* which was filed on January  
19 27, 2020 and is currently set to be heard on March 18, 2020.

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

DATED Tuesday, February 04, 2020.

Respectfully Submitted:

THE ABRAMS & MAYO LAW FIRM

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

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**AFFIDAVIT OF VINCENT MAYO, ESQ**

STATE OF NEVADA    )  
                                  ) ss:  
COUNTY OF CLARK    )

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

2. Counsel for Defendant has filed his *Motion to Withdraw as Attorney of Record for Defendant*, it is currently set to be heard on March 18, 2020. The parties will be in Court on February 24, 2020 at 9:30 p.m. on Plaintiff's *Motion for Reconsideration of the Court's December 9, 2019 Decision; for Proof of Chalese's Auto Insurance for the Last Year; and Related Relief*; as well as Defendant's *Opposition to Plaintiff's Motion for Reconsideration of the Court's December 9, 2019*. Accordingly, Adam respectfully requests that Attorney Shapiro's *Motion to Withdraw as Attorney of Record for Defendant* be heard concurrently in the interest of

1 judicial economy and to avoid multiple hearings causing additional  
2 attorney's fees.

3 3. Based upon the reasons set forth herein and in the interest of  
4 judicial economy, Adam respectfully requests that this Court shorten the  
5 time in which to hear Attorney Shapiro's *Motion to Withdraw as Attorney*  
6 *of Record for Defendant*, so that it is heard at the commencement of the the  
7 January 28, 2020 hearing.

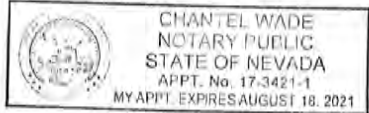
8 FURTHER, AFFIANT SAYETH NAUGHT.

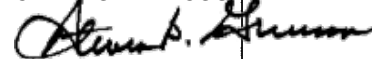
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VINCENT MAYO, ESQ.

SUBSCRIBED AND SWORN to before  
me this 14 day of February, 2020.

  
\_\_\_\_\_  
NOTARY PUBLIC





1 **ORDER**  
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@theabramsfirm.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 )  
16 Plaintiff, ) Department: I  
17 vs. )  
18 ) Date of Hearing: Dec. 9, 2019  
19 CHALESE MARIE SOLINGER, ) Time of Hearing: 8:00 a.m.  
20 )  
21 Defendant. )

22 **NO CONTACT ORDER**

23 After hearing arguments from counsel, reviewing the papers and  
24 pleadings on file in the above-entitled matter, and good cause appearing,  
25 the Honorable Cheryl B. Moss hereby orders the following:

26 **IT IS HEREBY ORDERED** that for the safety of both parties  
27 Joshua Douglas Lloyd (DOB: September 27, 1991) is hereby Ordered to  
28 have no contact with Adam Solinger (DOB: July 1, 1988) and Jessica  
29 Sellers (DOB: January 29, 1983). Joshua Douglas Lloyd shall have no  
30

1 contact what so ever with Adam Solinger or Jessica Sellers, either  
2 directly or through any 3<sup>rd</sup> parties. [Video cite 8:59:50]

3 **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
4 not come within 100 yards of Adam Solinger and Jessica Seller's  
5 residence, located at 7290 Sea Anchor Court, Las Vegas, Nevada 89131.  
6 [Video cite 9:00:11]

7 **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
8 not come within 100 yards of Adam Solinger's place of employment, Las  
9 Vegas Defense Group/Shouse Law, located at 2970 W. Sahara Ave., Las  
10 Vegas, Nevada 89102. [Video cite 9:00:30]

11 **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
12 not come within 100 yards of Jessica Seller's place of employment, The  
13 Nevada Attorney General's Office, located at 555 E. Washington Ave.  
14 #100, Las Vegas Nevada 89101. [Video cite 9:00:30]

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1           **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
2 not come within 100 yards of the children's daycare, Creative Kids  
3 located at 8355 Farm Road, Las Vegas, Nevada 89131. [Video cite  
4 9:00:38]

5           **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
6 not come within 100 yards of any place that Adam Solinger or Jessica  
7 Sellers frequent, as well as the children's medical care providers. [Video  
8 cite 9:00:36]

9 Dated this 5 day of FEBRUARY, 2020.

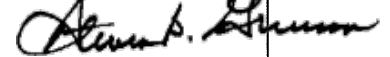
  
DISTRICT COURT JUDGE

12 Respectfully submitted:  
13 THE ABRAMS & MAYO LAW  
14 FIRM

15 \_\_\_\_\_  
16 Vincent Mayo, Esq. (8564)  
17 6252 S. Rainbow Blvd., Suite 100  
18 Las Vegas, Nevada 89118  
19 Tel: (702) 222-4021  
20 Fax: (702) 248-9750  
21 Attorney for Plaintiff

Approved as to form and content:  
PECOS LAW GROUP

\_\_\_\_\_  
Jack W. Fleeman, Esq. (10584)  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant



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

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

14 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
15 )  
16 Plaintiff, ) Department: I  
17 )  
18 vs. )  
19 )  
20 CHALESE MARIE SOLINGER, )  
21 )  
22 Defendant. )  
23 )  
24 )

25 **NOTICE OF ENTRY OF NO CONTACT ORDER**

26 PLEASE TAKE NOTICE that the No Contact Order was duly entered  
27 in the above-referenced matter. A true and correct copy of said

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Order is attached hereto.

DATED Thursday, February 06, 2020.

Respectfully Submitted,

THE ABRAMS & MAYO LAW FIRM

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

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Entry of No Contact Order* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Thursday, February 06, 2020. 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.

And via 1<sup>st</sup> class mail, postage prepaid to:

Joshua Lloyd  
4657 Curdsen Way  
Las Vegas, Nevada 89110

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



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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

8 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
9 Plaintiff, ) Department: I  
vs. )  
10 CHALESE MARIE SOLINGER, ) Date of Hearing: Dec. 9, 2019  
11 Defendant. ) Time of Hearing: 8:00 a.m.  
12

**NO CONTACT ORDER**

13  
14 After hearing arguments from counsel, reviewing the papers and  
15 pleadings on file in the above-entitled matter, and good cause appearing,  
16 the Honorable Cheryl B. Moss hereby orders the following:

17 **IT IS HEREBY ORDERED** that for the safety of both parties  
18 Joshua Douglas Lloyd (DOB: September 27, 1991) is hereby Ordered to  
19 have no contact with Adam Solinger (DOB: July 1, 1988) and Jessica  
20 Sellers (DOB: January 29, 1983). Joshua Douglas Lloyd shall have no  
21

1 contact what so ever with Adam Solinger or Jessica Sellers, either  
2 directly or through any 3<sup>rd</sup> parties. [Video cite 8:59:50]

3 **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
4 not come within 100 yards of Adam Solinger and Jessica Seller's  
5 residence, located at 7290 Sea Anchor Court, Las Vegas, Nevada 89131.  
6 [Video cite 9:00:11]

7 **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
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9 Vegas Defense Group/Shouse Law, located at 2970 W. Sahara Ave., Las  
10 Vegas, Nevada 89102. [Video cite 9:00:30]

11 **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
12 not come within 100 yards of Jessica Seller's place of employment, The  
13 Nevada Attorney General's Office, located at 555 E. Washington Ave.  
14 #100, Las Vegas Nevada 89101. [Video cite 9:00:30]

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1           **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
2 not come within 100 yards of the children's daycare, Creative Kids  
3 located at 8355 Farm Road, Las Vegas, Nevada 89131. [Video cite  
4 9:00:38]

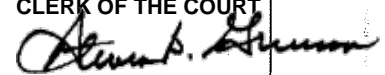
5           **IT IS FURTHER ORDERED** that Joshsua Douglas Lloyd shall  
6 not come within 100 yards of any place that Adam Solinger or Jessica  
7 Sellers frequent, as well as the children's medical care providers. [Video  
8 cite 9:00:36]

9 Dated this 5 day of FEBRUARY, 2020.

  
DISTRICT COURT JUDGE

12 Respectfully submitted:  
13 THE ABRAMS & MAYO LAW  
14 FIRM  
15 \_\_\_\_\_  
16 Vincent Mayo, Esq. (8564)  
17 6252 S. Rainbow Blvd., Suite 100  
18 Las Vegas, Nevada 89118  
19 Tel: (702) 222-4021  
20 Fax: (702) 248-9750  
21 Attorney for Plaintiff

Approved as to form and content:  
PECQS LAW GROUP  
\_\_\_\_\_  
Jack W. Fleeman, Esq. (10584)  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant



1 **ORDR**

2 **Bruce I. Shapiro, Esq.**  
Nevada Bar No. 004050

3 **Jack W. Fleeman, Esq.**  
Nevada Bar No. 010584

4 PECOS LAW GROUP  
5 8925 South Pecos Road, Suite 14A  
6 Henderson, Nevada 89074  
7 Telephone: (702) 388-1851  
8 Facsimile: (702) 388-7406  
9 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)  
10 *Attorneys for Defendant*

DISTRICT COURT  
FAMILY DIVISION  
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**

Date of Hearing: **December 9, 2019**

Time of Hearing: **8:00 a.m.**

16  
17 **ORDER FROM DECEMBER 9, 2019 HEARING**

18 THIS MATTER came on for hearing on the 9<sup>th</sup> day of December, 2019,  
19 before the Honorable Cheryl Moss, on for *Defendant's Motion for Temporary*  
20 *Spousal Support and Preliminary Attorney's Fees*, Plaintiff's opposition thereto  
21 and *Countermotion for Attorney's Fees and Costs*, Defendant's opposition to  
22 Plaintiff's countermotion, *Defendant's Motion for a Custody Evaluation,*  
23 *Attorney's Fees, and Related Relief*, Plaintiff's opposition thereto and  
24 *Countermotion for Attorney's Fees and Costs*, and Defendant's opposition to  
25 Defendant's countermotion; and Plaintiff, **Adam Michael Solinger** ("Adam")



1 present and represented by and through his attorney, **Vincent Mayo, Esq.** of THE  
2 **ABRAMS & MAYO LAW FIRM**; and Defendant, **Chalese Marie Solinger**  
3 (“Chalese”) present and represented by and through her attorneys, **Bruce I.**  
4 **Shapiro, Esq.** and **Alicia S. Exley, Esq.**, of PECOS LAW GROUP; the Court being  
5 fully advised in the premises and good cause appearing, makes the following  
6 findings and orders:  
7

8 THE COURT HEREBY FINDS that Chalese’s motion for a custody  
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12 alcohol issues. Those need to be explored, and a custody evaluation can  
13 certainly assist the court with that information.<sup>3</sup>
- 14 3. There is domestic violence now being alleged.<sup>4</sup>
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24 <sup>2</sup> See *Id.* at TI 8:47:30.

25 <sup>3</sup> See *Id.* at TI 8:47:33.

26 <sup>4</sup> See *Id.* at TI 8:47:50.

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8 support obligation from Adam's temporary spousal support obligation. Adam shall  
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13 a.m.<sup>29</sup>

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8 DATED this \_\_\_\_\_ day of FEB 05 2020, 20\_\_.

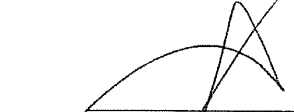
9  
10   
DISTRICT COURT JUDGE

11 Submitted by:  
12 PECOS LAW GROUP

13  #14190

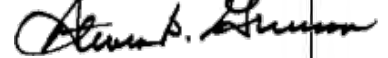
14 **Bruce I. Shapiro, Esq.**  
15 Nevada Bar No. 004050  
16 **Jack W. Fleeman, Esq.**  
17 Nevada Bar No. 010584  
18 8925 South Pecos Road, Suite 14A  
19 Henderson, Nevada 89074  
20 (702) 388-1851  
21 *Attorneys for Defendant*

As to form and content:  
THE ABRAMS & MAYO LAW FIRM

22 

23 **Vincent Mayo, Esq.**  
24 Nevada Bar No. 008564  
25 6252 S. Rainbow Blvd., Suite 100  
26 Las Vegas, Nevada 89118  
(702) 222-4021  
*Attorney for Plaintiff*

<sup>31</sup> See *Id.* at TI 9:17:33.



1 **NEOJ**  
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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](mailto:Bruce@pecoslawgroup.com)  
12 *Attorneys for Defendant*

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

**Adam Michael Solinger,**

Plaintiff,

vs.

**Chalese Marie Solinger,**

Defendant.

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

Dept No. **I**

**NOTICE OF ENTRY OF ORDER**

17 TO: **Adam Michael Solinger**, Plaintiff; and

18 TO: **Vincent Mayo, Esq.**, attorney for Plaintiff.

19 **YOU WILL PLEASE TAKE NOTICE** that the “**Order from December**  
20 **9, 2019 Hearing**” was entered in the above-captioned case on the **6<sup>th</sup>** day of  
21 **February, 2020**, by filing with the clerk. A true and correct copy of said Order is  
22 attached hereto and made a part hereof.

23 **DATED** this 6 day of February, 2020.

24   
**Bruce I. Shapiro, Esq.**

Nevada Bar No. 4050

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

*Attorney for Defendant*



1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that the "Notice of Entry of  
3 Order" in the above-captioned case were served this date as follows:

4  pursuant to NEFCR 9, by mandatory electronic service through the  
5 Eighth Judicial District Court's electronic filing system;

6  by placing the same to be deposited for mailing in the United  
7 States Mail, in a sealed envelope upon which first class postage was  
8 prepaid in Las Vegas, Nevada;


9  pursuant to EDCR 7.26 to be sent via **facsimile**, by duly executed  
10 consent for service by electronic means;

11  by hand-delivery with signed Receipt of Copy.

12 To individual(s) listed below at the address:

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

20  
21 DATED this 6<sup>th</sup> day of February, 2020.

22  
23   
24 **Angela Romero,**  
25 An employee of PECOS LAW GROUP  
26



1 **ORDER**  
2 **Bruce I. Shapiro, Esq.**  
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4 **Jack W. Fleeman, Esq.**  
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Case No. D-19-582245-D

Dept No. I

Date of Hearing: December 9, 2019

Time of Hearing: 8:00 a.m.

17 **ORDER FROM DECEMBER 9, 2019 HEARING**

18 THIS MATTER came on for hearing on the 9<sup>th</sup> day of December, 2019,  
19 before the Honorable Cheryl Moss, on for *Defendant's Motion for Temporary*  
20 *Spousal Support and Preliminary Attorney's Fees*, Plaintiff's opposition thereto  
21 and *Counter-motion for Attorney's Fees and Costs*, Defendant's opposition to  
22 Plaintiff's counter-motion, *Defendant's Motion for a Custody Evaluation,*  
23 *Attorney's Fees, and Related Relief*, Plaintiff's opposition thereto and  
24 *Counter-motion for Attorney's Fees and Costs*, and Defendant's opposition to  
25 Defendant's counter-motion; and Plaintiff, **Adam Michael Solinger** ("Adam")  
26

1 present and represented by and through his attorney, **Vincent Mayo, Esq.** of THE  
2 **ABRAMS & MAYO LAW FIRM**; and Defendant, **Chalese Marie Solinger**  
3 (“Chalese”) present and represented by and through her attorneys, **Bruce I.**  
4 **Shapiro, Esq.** and **Alicia S. Exley, Esq.**, of **PECOS LAW GROUP**; the Court being  
5 fully advised in the premises and good cause appearing, makes the following  
6 findings and orders:

7  
8 THE COURT HEREBY FINDS that Chalese’s motion for a custody  
9 evaluation should be granted based upon the following:<sup>1</sup>

- 10 1. This is a high-conflict case, and that needs to be explored.<sup>2</sup>
- 11 2. Adam is asserting Chalese needs psychotherapy and has possible drug or  
12 alcohol issues. Those need to be explored, and a custody evaluation can  
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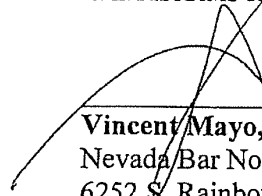
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9  
10   
DISTRICT COURT JUDGE

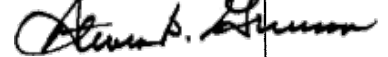
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As to form and content:  
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17 Nevada Bar No. 010584  
18 8925 South Pecos Road, Suite 14A  
19 Henderson, Nevada 89074  
20 (702) 388-1851  
21 *Attorneys for Defendant*

22   
23 Vincent Mayo, Esq.  
24 Nevada Bar No. 008564  
25 6252 S. Rainbow Blvd., Suite 100  
26 Las Vegas, Nevada 89118  
(702) 222-4021  
*Attorney for Plaintiff*

26 <sup>31</sup> See *Id.* at TI 9:17:33.



1 **NNOP**  
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  
7 Family Division  
Clark County, Nevada

8 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
9 Plaintiff, ) Department: I  
10 vs. ) Date of Hearing: 3/18/2020  
11 CHALESE MARIE SOLINGER, ) Time of Hearing: No appearance  
12 Defendant. ) required

13  
14 **NOTICE OF NON-OPPOSITION TO MOTION TO WITHDRAW**  
15 **AS ATTORNEY OF RECORD FOR DEFENDANT**

16 **COMES NOW** the Plaintiff, ADAM MICHAEL SOLINGER, by and  
17 through his attorney of record, VINCENT MAYO, ESQ., of THE ABRAMS  
18 & MAYO LAW FIRM, and hereby puts the Court on notice that he does

19 ///

20 ///

21

1 not oppose Pecos Law Group's Motion to Withdraw as Attorney of Record  
2 for Defendant.

3 DATED Wednesday, February 12, 2020.

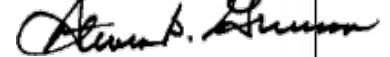
4 Respectfully Submitted,  
5 THE ABRAMS & MAYO LAW FIRM  
6 /s/ Vincent Mayo, Esq.  
7 Vincent Mayo, Esq. (8564)  
8 6252 South Rainbow Blvd., Suite 100  
9 Las Vegas, Nevada 89118  
10 Attorney for Plaintiff

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that the foregoing *NOTICE OF NON-OPPOSITION*  
13 *TO MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR*  
14 *DEFENDANT* was filed electronically with the Eighth Judicial District  
15 Court in the above-entitled matter, on Wednesday, February 12, 2020.  
16 Electronic service of the foregoing document shall be made in accordance  
17 with the Master Service List, pursuant to NEFCR 9, as follows:

18 Bruce I. Shapiro, Esq.  
19 Jack W. Fleeman, Esq.  
20 Attorney for Defendant

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



1 **REQT**  
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](mailto:Bruce@pecoslawgroup.com)  
12 *Attorneys for Defendant*

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

9 **Adam Michael Solinger,**

10 Plaintiff,

11 vs.

12 **Chalese Marie Solinger,**

13 Defendant.

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

Dept No. **I**

14 **REQUEST FOR SUBMISSION OF MOTION TO**  
15 **WITHDRAW AS COUNSEL OF RECORD**

16 Movants, **Bruce I. Shapiro, Esq., Jack W. Fleeman, Esq.** and **PECOS**  
17 **LAW GROUP**, filed a Motion to Withdraw as Counsel of Record for Defendant on  
18 January 27, 2020. The same is currently set for hearing on March 18, 2020 in  
19 Department I. The same was served on Defendant and the adverse party by  
20 regular U.S. mail and e-mail/e-service pursuant to EDCR 8.05(a), EDCR 8.05(f),  
21 NRCR 5(b)(2)(D) and NEFCR 9 by mandatory electronic service through the

22

1 Eighth Judicial District Court's electronic filing system on the 27<sup>th</sup> day of  
2 January, 2020 to:

3 Vincent Mayo	VMGroup@TheAbramsLawFirm.com
4 admin email	email@pecoslawgroup.com
5 Jack Fleeman	jack@pecoslawgroup.com
6 Amy Robinson	amy@pecoslawgroup.com
7 Angela Romero	angela@pecoslawgroup.com
8 Bruce Shapiro	bruce@pecoslawgroup.com

9 **Chalese Marie Solinger**  
10 4657 Curdsen Way  
11 Las Vegas, Nevada 89110  
12 *Defendant*

13 The adverse party was required to file a response to same no later than  
14 February 11, 2020. No opposition was filed by the adverse party or Defendant.

15 The movants request the same be vacated from the court's calendar and  
16 immediately submitted to the chambers of the court for submission on the papers.

17 A proposed Order is submitted herewith.

18 **DATED** this 12<sup>th</sup> day of February, 2020.

19   
20 Bruce I. Shapiro, Esq.  
21 Nevada Bar No. 004050  
22 **Jack W. Fleeman, Esq.**  
Nevada Bar No. 010584  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

February 13, 2020

D-19-582245-D Adam Michael Solinger, Plaintiff  
vs.  
Chalese Marie Solinger, Defendant.

**February 13, 2020 8:20 AM Minute Order**

**HEARD BY:** Moss, Cheryl B. **COURTROOM:** Courtroom 13

**COURT CLERK:** Tanya Stengel

**PARTIES:**

Adam Solinger, Plaintiff, Counter Defendant, Vincent Mayo, Attorney, not present  
not present  
Chalese Solinger, Defendant, Counter Bruce Shapiro, Attorney, not present  
Claimant, not present  
Marie Solinger, Subject Minor, not present  
Michael Solinger, Subject Minor, not present

**JOURNAL ENTRIES**

- MINUTE ORDER - NO HEARING HELD

NRCP 1 and EDCR 1.10 state that the procedure in district courts shall be administered to ensure efficient, speedy, and inexpensive determinations in every action. Pursuant to EDCR 2.23(c) and 5.11(e), this Court can consider a motion and issue a decision on the papers at any time without a hearing.

On January 02, 2020 Defendant filed an Objection to Plaintiff's Brunzell Affidavit for Attorney's Fees and Costs.

The COURT FINDS that Defendant's Objection was erroneously set for an Objection hearing on February 18, 2020 at 10:30am.

PRINT DATE:	02/13/2020	Page 1 of 3	Minutes Date:	February 13, 2020
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

Therefore, this COURT ORDERS that the Objection Hearing set for February 18, 2020 at 10:30am is hereby vacated.

A copy of this court minute order shall be served on all parties.

SO ORDERED.

CLERK'S NOTE: A copy of the Minute Order was mailed to parties at the address(es) listed on court records 2/13/2020. (ts)

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

*Canceled: February 18, 2020 10:30 AM Objection  
Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica*

February 24, 2020 9:30 AM Motion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

February 24, 2020 9:30 AM Opposition & Countermotion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

February 24, 2020 9:30 AM Motion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

March 18, 2020 2:30 AM Motion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

June 30, 2020 1:30 PM Evidentiary Hearing  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

July 01, 2020 1:30 PM Evidentiary Hearing

PRINT DATE:	02/13/2020	Page 2 of 3	Minutes Date:	February 13, 2020
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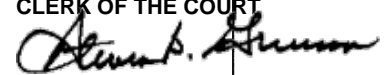
**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

July 02, 2020 9:30 AM Evidentiary Hearing  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

PRINT DATE:	02/13/2020	Page 3 of 3	Minutes Date:	February 13, 2020
-------------	------------	-------------	---------------	-------------------





1 **ORDR**  
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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

8 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
9 )  
10 Plaintiff, ) Department: I / Discovery  
11 vs. )  
12 )  
13 CHALESE MARIE SOLINGER, )  
14 )  
15 Defendant. )

**ORDER ON DISCOVERY COMMISSIONER'S REPORT AND  
RECOMMENDATIONS**

The Court, having reviewed the above report and  
recommendations prepared by the Discovery Commissioner and,

No timely objection having been filed,

After reviewing the objections to the Report and  
Recommendations and good cause appearing,

AND

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

1 \_\_\_\_\_ **IT IS HEREBY ORDERED** the Discovery Commissioner's  
2 Report and Recommendations are affirmed and adopted as modified in  
3 the following manner (attached hereto).

4 \_\_\_\_\_ **IT IS HEREBY ORDERED** this matter is remanded to the  
5 Discovery Commissioner for reconsideration or further action.

6 \_\_\_\_\_ **IT IS HEREBY ORDERED** the Discovery Commissioner's  
7 Report and Recommendations are reversed.

8 \_\_\_\_\_ **IT IS HEREBY ORDERED** that a hearing on the  
9 Commissioner's Report is set for the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,  
10 at \_\_\_\_\_.

11 Dated this 12 day of February 2020.

12  
13   
14 \_\_\_\_\_  
15 DISTRICT COURT JUDGE  
16  
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18  
19  
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21

#2

Electronically Filed  
1/23/2020 2:18 PM  
Steven D. Grierson  
CLERK OF THE COURT



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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

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

13 **REPORT AND RECOMMENDATIONS**

14 This matter coming on for hearing on the 6<sup>th</sup> day of December,  
15 2019, before Discovery Commissioner Holly Fic, upon Plaintiff's *Motion*  
16 *to Compel Discovery Responses and for Attorney's Fees*, Defendant's  
17 *Opposition to Plaintiff's Motion to Compel Discovery Responses and for*  
18 *Attorney's Fees*, and Plaintiff's *Reply in Support of Motion to Compel*  
*Discovery Responses and Attorney's Fees* with Plaintiff, ADAM  
MICHAEL SOLINGER, appearing in person and by and through his  
attorney of record, VINCENT MAYO, ESQ., of THE ABRAMS & MAYO

RECEIVED

DEC 20 2019

DISCOVERY

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

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

**REPORT AND RECOMMENDATIONS**

This matter coming on for hearing on the 6<sup>th</sup> day of December, 2019, before Discovery Commissioner Holly Fic, upon Plaintiff's *Motion to Compel Discovery Responses and for Attorney's Fees*, Defendant's *Opposition to Plaintiff's Motion to Compel Discovery Responses and for Attorney's Fees*, and Plaintiff's *Reply in Support of Motion to Compel Discovery Responses and Attorney's Fees* with Plaintiff, ADAM MICHAEL SOLINGER, appearing in person and by and through his attorney of record, VINCENT MAYO, ESQ., of THE ABRAMS & MAYO

RECEIVED  
DEC 20 2019  
DISCOVERY

1 LAW FIRM, and Defendant, CHALESE MARIE SOLINGER, appearing  
2 by and through her attorney of record, JACK FLEEMAN, ESQ., OF  
3 PECOS LAW GROUP, and the Court having reviewed the pleadings on  
4 file, heard the arguments of counsel, hereby makes the following  
5 findings and recommendations,

6 **FINDINGS**

7 1. EDCR 5.602 has been met as counsel for Plaintiff has asked  
8 several times for Discovery Responses, including in person.

9 2. It is not Plaintiff's fault that Defendant's first attorney did  
10 not communicate with her regarding discovery. Defendant can do  
11 whatever it is she needs to do with regard to Mr. Schneider.

12 3. Even though the discovery requests were answered, they  
13 were not substantive responses. Therefore, they need to be responded to.

14 4. The argument from Defendant's Counsel that there was no  
15 end date is not persuasive to this Court as Plaintiff's Counsel requested  
16 the documents multiple times and an extension was never requested.

17 **RECOMMENDATIONS**

18 Therefore, the Commissioner recommends as follows:

19 1. Plaintiff's Motion to Compel is Granted.

20 2. Defendant shall complete and do a supplement regarding the  
21 deficiencies, no later than December 13, 2019. Court informed counsels

1 that Discovery is not being re-opened, it is just for the Discovery that has  
2 already been propounded and Defendant needs to respond to /  
3 supplement.

4 3. Parties' counsel shall have an EDCR 5.602 telephone call to  
5 discuss anything that is needed. If Defendant's counsel is working with  
6 Plaintiff's counsel and get the majority of the deficiencies completed and  
7 waiting for one (1) or two (2) documents, counsel is to make sure it is  
8 completed by the return date, December 20, 2019, if anything has to be  
9 discussed.

10 4. Attorney Fees and Costs are granted to Plaintiff. Plaintiff's  
11 counsel shall submit a Memorandum of Fees and Costs and redacted  
12 billing, including language that "the Commissioner having reviewed the  
13 Brunzell Affidavit and redacted invoice, and after considering the factors  
14 in Brunzell v. Golden Gate National Bank, 85 Nev. 345 (1969) attorney  
15 fees in the amount of <sup>\*3888.50 (H)</sup> (leave a blank) are awarded."

16 5. Status Check date is set for submission of Report and  
17 Recommendations and deficiency issues. If the Report and  
18 Recommendation is received by December 18, 2019, at 5:00 p.m., no  
19 appearances will be required, and this date will be vacated. Attorney  
20 Mayo shall prepare the Report and Recommendation relative to  
21

1 Plaintiff's Motion to Compel and Attorney Fleeman shall sign as to form  
2 and content.

3 6. Attorney Mayo shall prepare the Report and  
4 Recommendation from today's hearing with regard to the Motion to  
5 Compel and Attorney Fleeman shall review and sign off.

6 7. The Report and Recommendation is due on December 18,  
7 2019, by 5:00 p.m. A Status Check is set for December 20, 2019, at 1:30  
8 p.m. If the Report and Recommendation is received by December 18,  
9 2019, there shall be no need for counsel to appear at the Status Check.

10 Dated this 20<sup>th</sup> day of JANUARY, 2020.

11   
12 DISCOVERY COMMISSIONER

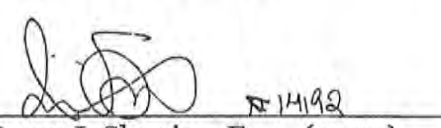
13 Respectfully Submitted:

Approved as to form and content:

14 THE ABRAMS & MAYO LAW  
15 FIRM

PECOS LAW GROUP

16   
17 Vincent Mayo, Esq.  
18 Nevada State Bar Number: 8564  
19 6252 S. Rainbow Blvd., Suite 100  
20 Las Vegas, Nevada 89118  
21 Tel: (702) 222-4021  
Fax: (702) 248-9750  
Attorney for Plaintiff

  
Bruce I. Shapiro, Esq. (4050)  
Jack W. Fleeman, Esq. (10584)  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant

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**NOTICE**

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

Objection time will expire on February 6<sup>th</sup> 2020.

A copy of the foregoing Discovery Commissioner's Report was:

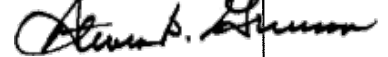
\_\_\_\_\_ Mailed to Plaintiff/Defendant on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Electronically filed and served counsel on 23<sup>rd</sup> day of January, 2020, pursuant to N.E.F.C.R. Rule 9.

The Commissioner's Report is deemed received at the time it is e-served to a party or the party's attorney. Alternatively, the Commissioner's Report is deemed received three (3) days after mailing to a party or the party's attorney or (3) days after the clerk of the court deposits a copy of the Report in a folder of a party's lawyer in the Clerk's office. E.D.C.R. 2.34(f).

By: Mary Brechon  
COMMISSIONER DESIGNEE





1 **NEOJ**  
2 Vincent Mayo, Esq.  
3 Nevada State Bar Number: 8564  
4 **THE ABRAMS & MAYO LAW FIRM**  
5 6252 South Rainbow Blvd., Suite 100  
6 Las Vegas, Nevada 89118  
7 Tel: (702) 222-4021  
8 Fax: (702) 248-9750  
9 Email: VMGroup@theabramsfirm.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 )  
16 Plaintiff, ) Department: I  
17 )  
18 vs. )  
19 )  
20 CHALESE MARIE SOLINGER, )  
21 )  
22 Defendant. )  
23 )  
24 )

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

27 PLEASE TAKE NOTICE that the *Order on Discovery*  
28 *Commissioner's Report and Recommendations* was duly entered in the  
29 above-referenced matter. A true and correct copy of said

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Order is attached hereto.

DATED Wednesday, February 19, 2020.

Respectfully Submitted,

THE ABRAMS & MAYO LAW FIRM

/s/ Vincent Mayo, Esq. \_\_\_\_\_

Vincent Mayo, Esq.

Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Entry of Order on Discovery Commissioner's Report and Recommendations* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on ~~Wednesday~~ <sup>Thursday</sup>, February ~~19~~ <sup>20</sup>, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Kristina C. Kirigin, Esq.

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



1 **ORDER**  
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  
7 Family Division  
Clark County, Nevada

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

12  
13 **ORDER ON DISCOVERY COMMISSIONER'S REPORT AND  
RECOMMENDATIONS**

14 The Court, having reviewed the above report and  
15 recommendations prepared by the Discovery Commissioner and,

16  No timely objection having been filed,

17  After reviewing the objections to the Report and  
18 Recommendations and good cause appearing,

19 **AND**

20  **IT IS HEREBY ORDERED** the Discovery Commissioner's  
21 Report and Recommendations are affirmed and adopted.

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\_\_\_\_\_ **IT IS HEREBY ORDERED** the Discovery Commissioner's Report and Recommendations are affirmed and adopted as modified in the following manner (attached hereto).

\_\_\_\_\_ **IT IS HEREBY ORDERED** this matter is remanded to the Discovery Commissioner for reconsideration or further action.

\_\_\_\_\_ **IT IS HEREBY ORDERED** the Discovery Commissioner's Report and Recommendations are reversed.

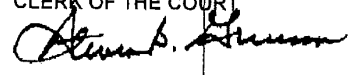
\_\_\_\_\_ **IT IS HEREBY ORDERED** that a hearing on the Commissioner's Report is set for the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_.

Dated this 12 day of February 2020.

  
\_\_\_\_\_  
DISTRICT COURT JUDGE

#2

Electronically Filed  
1/23/2020 2:18 PM  
Steven D. Grierson  
CLERK OF THE COURT



1 **RAR**  
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@theabramsfirm.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 )  
16 Plaintiff, ) Department: I / Discovery  
17 vs. )  
18 )  
19 CHALESE MARIE SOLINGER, )  
20 )  
21 Defendant. )

22 **REPORT AND RECOMMENDATIONS**

23 This matter coming on for hearing on the 6<sup>th</sup> day of December,  
24 2019, before Discovery Commissioner Holly Fic, upon Plaintiff's *Motion*  
25 *to Compel Discovery Responses and for Attorney's Fees*, Defendant's  
26 *Opposition to Plaintiff's Motion to Compel Discovery Responses and for*  
27 *Attorney's Fees*, and Plaintiff's *Reply in Support of Motion to Compel*  
28 *Discovery Responses and Attorney's Fees* with Plaintiff, ADAM  
MICHAEL SOLINGER, appearing in person and by and through his  
attorney of record, VINCENT MAYO, ESQ., of THE ABRAMS & MAYO

RECEIVED

DEC 20 2019

DISCOVERY

1 LAW FIRM, and Defendant, CHALESE MARIE SOLINGER, appearing  
2 by and through her attorney of record, JACK FLEEMAN, ESQ., OF  
3 PECOS LAW GROUP, and the Court having reviewed the pleadings on  
4 file, heard the arguments of counsel, hereby makes the following  
5 findings and recommendations,

6 **FINDINGS**

7 1. EDCR 5.602 has been met as counsel for Plaintiff has asked  
8 several times for Discovery Responses, including in person.

9 2. It is not Plaintiff's fault that Defendant's first attorney did  
10 not communicate with her regarding discovery. Defendant can do  
11 whatever it is she needs to do with regard to Mr. Schneider.

12 3. Even though the discovery requests were answered, they  
13 were not substantive responses. Therefore, they need to be responded to.

14 4. The argument from Defendant's Counsel that there was no  
15 end date is not persuasive to this Court as Plaintiff's Counsel requested  
16 the documents multiple times and an extension was never requested.

17 **RECOMMENDATIONS**

18 Therefore, the Commissioner recommends as follows:

19 1. Plaintiff's Motion to Compel is Granted.

20 2. Defendant shall complete and do a supplement regarding the  
21 deficiencies, no later than December 13, 2019. Court informed counsels

1 that Discovery is not being re-opened, it is just for the Discovery that has  
2 already been propounded and Defendant needs to respond to /  
3 supplement.

4 3. Parties' counsel shall have an EDCR 5.602 telephone call to  
5 discuss anything that is needed. If Defendant's counsel is working with  
6 Plaintiff's counsel and get the majority of the deficiencies completed and  
7 waiting for one (1) or two (2) documents, counsel is to make sure it is  
8 completed by the return date, December 20, 2019, if anything has to be  
9 discussed.

10 4. Attorney Fees and Costs are granted to Plaintiff. Plaintiff's  
11 counsel shall submit a Memorandum of Fees and Costs and redacted  
12 billing, including language that "the Commissioner having reviewed the  
13 Brunzell Affidavit and redacted invoice, and after considering the factors  
14 in Brunzell v. Golden Gate National Bank, 85 Nev. 345 (1969) attorney  
15 fees in the amount of <sup>3888.50 (H)</sup> (leave a blank) are awarded."

16 5. Status Check date is set for submission of Report and  
17 Recommendations and deficiency issues. If the Report and  
18 Recommendation is received by December 18, 2019, at 5:00 p.m., no  
19 appearances will be required, and this date will be vacated. Attorney  
20 Mayo shall prepare the Report and Recommendation relative to

21

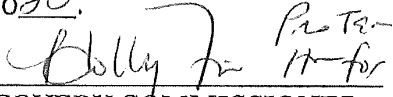


1 Plaintiff's Motion to Compel and Attorney Fleeman shall sign as to form  
2 and content.

3 6. Attorney Mayo shall prepare the Report and  
4 Recommendation from today's hearing with regard to the Motion to  
5 Compel and Attorney Fleeman shall review and sign off.

6 7. The Report and Recommendation is due on December 18,  
7 2019, by 5:00 p.m. A Status Check is set for December 20, 2019, at 1:30  
8 p.m. If the Report and Recommendation is received by December 18,  
9 2019, there shall be no need for counsel to appear at the Status Check.

10 Dated this 20<sup>th</sup> day of JANUARY, 2020.

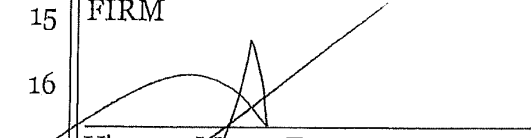
11   
12 DISCOVERY COMMISSIONER

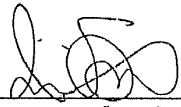
13 Respectfully Submitted:

Approved as to form and content:

14 THE ABRAMS & MAYO LAW  
15 FIRM

PECOS LAW GROUP

16   
17 Vincent Mayo, Esq.  
18 Nevada State Bar Number: 8564  
19 6252 S. Rainbow Blvd., Suite 100  
20 Las Vegas, Nevada 89118  
21 Tel: (702) 222-4021  
Fax: (702) 248-9750  
Attorney for Plaintiff

 A 14192  
Bruce I. Shapiro, Esq. (4050)  
Jack W. Fleeman, Esq. (10584)  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant

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**NOTICE**

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

Objection time will expire on February 6<sup>th</sup> 2020.

A copy of the foregoing Discovery Commissioner's Report was:

           Mailed to Plaintiff/Defendant on the        day of           ,  
20   .

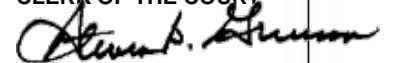
  X   Electronically filed and served counsel on 23<sup>rd</sup> day of January,  
2020, pursuant to N.E.F.C.R. Rule 9.

The Commissioner's Report is deemed received at the time it is e-served to a party or the party's attorney. Alternatively, the Commissioner's Report is deemed received three (3) days after mailing to a party or the party's attorney or (3) days after the clerk of the court deposits a copy of the Report in a folder of a party's lawyer in the Clerk's office. E.D.C.R. 2.34(f).

By: Mary Brechon  
COMMISSIONER DESIGNEE

ORIGINAL

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**OWAR**  
**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](mailto:Bruce@pecoslawgroup.com)  
*Attorneys for Defendant*

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

**Adam Michael Solinger,**  
  
Plaintiff,  
  
vs.  
  
**Chalese Marie Solinger,**  
  
Defendant.

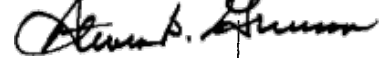
Case No. **D-19-582245-D**  
Dept No. **I**

**ORDER TO WITHDRAW AS COUNSEL OF RECORD**

Bruce I. Shapiro, Esq., Jack W. Fleeman, Esq. and Pecos Law Group's  
*Motion To Withdraw as Counsel of Record* was filed on January 27, 2020, having  
been submitted on a Request for Submission pursuant to EDCR 5.504, the Court  
having reviewed the pleadings and other documents filed in this case by all parties  
hereto, and good cause appearing therefore, this Court finds as follows:

...





1 SUB  
2 Kristina C. Kirigin, Esq.  
3 Nevada Bar No. 10971  
4 VEGAS WEST ATTORNEYS  
5 5594 South Fort Apache Road, Suite 120  
6 Las Vegas, Nevada 89148  
7 Telephone: (702) 629-7553  
8 Facsimile: (702) 629-2276  
9 Email: [kristina@vegaswestattorneys.com](mailto:kristina@vegaswestattorneys.com)  
10 *Attorneys for Defendant*

DISTRICT COURT  
CLARK COUNTY, NEVADA

11 Adam Michael Solinger,  
12 Plaintiff,

13 vs.

14 Chalese Marie Solinger,  
15 Defendant.

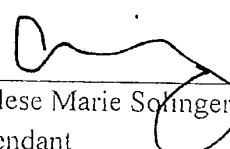
Case No. D-19-582245-D  
Dept No. I

Date of Hearing: NA  
Time of Hearing: NA

16  
17 SUBSTITUTION OF ATTORNEYS

18 The Defendant, Chalese Marie Solinger, hereby substitutes Kristina C.  
19 Kirigin, Esq. of VEGAS WEST ATTORNEYS, as her attorney in the above-entitled  
20 action in the place and stead of Bruce I. Shapiro, Esq. of PECOS LAW GROUP.

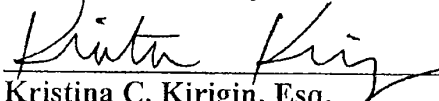
21 DATED this 19 day of February 2020.

22  
23  
24   
25 Chalese Marie Solinger  
26 Defendant

1 Kristina C. Kirigin, Esq., of VEGAS WEST ATTORNEYS, does hereby agree to  
2 be substituted in the place and stead of Bruce I. Shapiro, Esq., of PECOS LAW  
3 GROUP, attorney of record for Defendant, Chalese Marie Solinger, in the above-  
4 entitled action.

5  
6 DATED this 18<sup>th</sup> day of February 2020.

7 vegas west attorneys

8 

9 **Kristina C. Kirigin, Esq.**

10 Nevada Bar No. 10971

11 5594 South Fort Apache Road, Suite 120

12 Las Vegas, Nevada 89148

13 Telephone: (702) 629-7553

14 Facsimile: (702) 629-2276

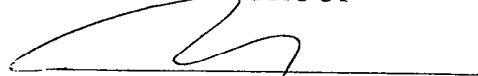
15 Email: [kristina@vegaswestattorneys.com](mailto:kristina@vegaswestattorneys.com)

16 *Attorneys for Defendant*

17 Bruce I. Shapiro, Esq., Pecos Law Group does hereby agree to the  
18 substitution of Kristina C. Kirigin, Esq., of VEGAS WEST ATTORNEYS, as attorney of  
19 record in the above-entitled action for Defendant, Chalese Marie Solinger.

20 DATED this 19 day of February 2020.

21 **PECOS LAW GROUP**

22 

23 **Bruce I. Shapiro, Esq.**

24 Nevada Bar No. 4050

25 8925 South Pecos Road, Suite 14A

26 Henderson, Nevada 89074

Telephone: (702) 388-1851

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Email: [bruce@pecoslawgroup.com](mailto:bruce@pecoslawgroup.com)

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that the foregoing “**Substitution of Attorneys**” in the above-captioned case was served this date as follows:


- by e-service, pursuant to Rule 9 of N.E.F.C.R., E.D.C.R. 7.26(a)(4), and E.J.D.C. AO 9-12 and AO 14-2, to the following email(s), which is/are the email(s) registered with the electronic filing system:
- by placing the 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;
- pursuant to EDCR 7.26 to be sent via facsimile, by duly executed consent for service by electronic means;
- by hand-delivery with signed Receipt of Copy.

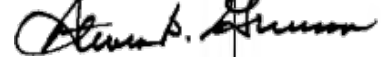
To attorneys/people listed below at the address:

Vincent Mayo, Esq.  
THE ABRAMS & MAYO LAW FIRM  
E-Mail: VMGroup@TheAbramsLawFirm.com  
*Attorneys for Plaintiff*

Bruce I. Shapiro, Esq.  
PECOS LAW GROUP  
E-Mail: Bruce@PecosLawGroup.com  
Email@PecosLawGroup.com  
Alicia@PecosLawGroup.com  
Jack@PecosLawGroup.com  
Amy@PecosLawGroup.com  
Angela@PecosLawGroup.com

DATED this 19<sup>th</sup> day of February 2020.

  
\_\_\_\_\_  
Alex Gomez  
An employee of **vegas west attorneys**



1 **MOT**  
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](mailto:VMGroup@theabramslawfirm.com)  
Attorney for Plaintiff

6 Eighth Judicial District Court  
7 Family Division  
Clark County, Nevada

8 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
9 Plaintiff, ) Department: I  
vs. )  
10 CHALESE MARIE SOLINGER, )  
11 Defendant. ) **Oral Argument is Requested**  
12 )

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

16 **MOTION FOR AN ORDER TO SHOW CAUSE AND TO HOLD**  
**DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF**  
17 **THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019 ORDER,**  
**AND THE BEHAVIOR ORDER FILED MARCH 19, 2019; FOR**  
18 **ATTORNEY'S FEES AND COSTS AND RELATED RELIEF**

19 NOW INTO COURT comes Plaintiff, ADAM MICHAEL SOLINGER,  
20 by and through his attorney, Vincent Mayo, Esq., of The Abrams & Mayo  
21 Law Firm, and hereby submits his *MOTION FOR AN ORDER TO SHOW*



1 CAUSE AND TO HOLD DEFENDANT IN CONTEMPT OF COURT FOR  
2 VIOLATION OF THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019  
3 ORDER, AND THE BEHAVIOR ORDER FILED MARCH 19, 2019; FOR  
4 ATTORNEY'S FEES AND COSTS AND RELATED RELIEF.

5 This Motion is made and based upon the attached Points and  
6 Authorities, the Affidavit attached hereto, all papers and pleadings on file  
7 herein, and any oral argument adduced at the hearing of this matter.

8 Dated Friday, February 21, 2020.

9 Respectfully Submitted,

10 THE ABRAMS & MAYO LAW FIRM

11 \_\_\_\_\_  
12 Vincent Mayo, Esq.  
13 Nevada State Bar Number: 8564  
14 6252 South Rainbow Blvd., Suite 100  
15 Las Vegas, Nevada 89118  
16 Attorney for Plaintiff  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. STATEMENT OF FACTS**

As relevant to this motion, the Court issued orders after hearings on March 19, 2019 and June 17, 2019 specifically intending to regulate the parties' behavior. Of note is the fact there has been no allegation that Adam has ever violated this Court's orders. However, Chalese has continually and constantly violated every single Court order.

Chalese has consistently withheld the children whenever she feels like it. She withheld the children in February of 2019, she withheld Marie after Marie's dental surgery, she picked up the children early from day care in August of 2019, and in December of 2019 she withheld the children over Adam's vacation time that Chalese had known about for over three months.

Chalese consistently speaks about the divorce and the litigation surrounding it in front of Michael and Marie. She has broken down into tears and sobbed in front of the children about discussing with Michael specifically that "daddy is mean to mommy."

During July of 2019, when Adam was trying to get his property out of the former marital residence and had previously arranged to get it out with Chalese's permission, Chalese changed her mind and then

1 threatened to have Josh come outside and explain to Adam “in simple  
2 terms” that he was not getting his stuff.

3 Chalese consistently and constantly tells others that Adam is a  
4 pedophile who has possession of child pornography despite having no  
5 evidence of this and acknowledging under oath at her deposition that she  
6 had no evidence of it. She did this as recently as October of 2019 in an  
7 effort to get one of the witnesses in this case to testify favorably for her.

8 Chalese’s drug habit is out of control. She tested dirty in the two  
9 legitimate tests that she’s taken. For her August 2019 test, she refused to  
10 go test until the next day, which is a presumptive dirty test. For her  
11 September 2019 test, she went and purchased a drug detox kit, went to  
12 the testing facility, got scared and left to a gas station, then went back to  
13 the smoke shop she purchased the detox from to purchase something else,  
14 and then tested right before the 4 hour window was up. These are not the  
15 actions of someone who is clean from drug usage. It’s clear that she has  
16 lied to this Court about not using drug and she has defrauded the Court  
17 through her actions.

18 Chalese has never successfully completed a video walkthrough as  
19 ordered by the Court. Her first video walkthrough omitted several areas  
20 of the house. She completely ignored it in July of 2019 and February of  
21 2020.

1 Chalese ignores Adam's inquiries about how the children are doing  
2 when they are in her care. Refusing to communicate how the kids are  
3 doing while they are sick, refusing to respond to whether the kids are  
4 running fevers or if they are feeling better. Not only will Chalese refuse to  
5 relay how the kids are doing health wise, she refuses to communicate as  
6 to whether the kids have eaten dinner at pick up.

7 Chalese still allows Josh to drive the children consistently despite  
8 this Court's strong admonishment about the danger Josh poses to the  
9 children.

10 Chalese allows Josh to get high on marijuana around the children  
11 despite the danger of secondhand smoke, yet alone secondhand  
12 marijuana smoke. In fact, Chalese allows Josh to get high so often she  
13 claims that is why she needed the detox kit.

14 Chalese allows Josh to threaten the children. Michael has stated  
15 numerous times that Josh has threatened to "whoop" Michael and Jesse's,  
16 Josh's son, asses if they were not quiet.

17 Chalese has not only allowed Josh to threaten Adam directly, she  
18 has encouraged it. She was the one that asked if Adam needed Josh to  
19 explain something to him "in simple" terms in July 2019. Chalese was the  
20 one that called Josh when she was unlawfully withholding the children in  
21 December of 2019. When he arrived, he ran up to Jessica's truck, told

1 Adam he would “knock him the fuck out” and “beat the shit out of him,”  
2 and then tried to open Jessica’s truck to make good on his threat. Josh  
3 then left and Chalese allowed him to get into his truck and drive head on  
4 at Jessica’s truck in which Adam, Jessica, and Jessica’s minor daughter  
5 were sitting in.

6 Finally, Chalese is a complete and utter liar. It hurts the children  
7 and it makes the Court a party to her financial extortion. Chalese lied to  
8 the Court with her drug tests. Chalese lied to this Court to extort money  
9 from Adam via a fraudulent claim for spousal support. Only after it was  
10 pointed out that Chalese allowed Josh to threaten Adam, threaten to “beat  
11 the shit out of him,” drive his truck head on at everyone in Jessica’s truck,  
12 Chalese claimed on rebuttal at the hearing shortly after the incident that  
13 she and Josh had broken up. This Court ruled that had Josh and Chalese  
14 not broken up, Chalese would not get spousal support. Chalese lied to this  
15 Court in order to unlawfully obtain money because that has been her goal  
16 through this entire litigation: **to get money**. As set forth above and  
17 below, she does not care about the children. Chalese’s motive has always  
18 been financial and how to defraud individuals to obtain these financial  
19 wants without her having to lift a finger. This shows in her blatant lies to  
20 the court and the neglect of the children while they are in her care.

21 ///

1 Her lying to the court and the children in regard to her “split up”  
2 with Josh severely affected the children because it either made them think  
3 that they had lost “family members<sup>1</sup>” or it made them a party to the lie.  
4 Michael came back to Adam after the incident and talked about how Josh  
5 and Jesse had moved out and that everyone was crying. This blatant and  
6 unacceptable lie premised on obtaining money and causing emotional  
7 turmoil for the children cannot go unnoticed.

8 **II. LAW AND ARGUMENT**

9 **A. Chalese Should be Held in Contempt of Court**

10 The authority here for the Court to enforce its order is under NRS  
11 22.010(3), which states that “[d]isobedience or resistance to any lawful  
12 writ, order, rule or process issued by the court or judge at chambers” is an  
13 act constituting contempt. The United States Court of Appeals for the  
14 Ninth Circuit has more explicitly stated the judicial rationale and scope of  
15 penalties for behavior such as Chalese’s:

16 [c]ivil contempt is characterized by the court’s desire to . . .  
17 compensate the condemner’s adversary for the injuries which  
result from the noncompliance.<sup>2</sup>

18 ///

19 ///

20 <sup>1</sup> Michael and Marie have been told that Jesse and Arielle, Josh’s children, are their  
brother and sister and that Josh is their dad.

21 <sup>2</sup> *In re Crystal Palace Gambling Hall, Inc.*, 817 F.2d 1361 (9<sup>th</sup> Cir. 1987), citing *Falstaff  
Brewing Corp. v. Miller Brewing Co.*, 702 F.2d 770, 778 (9<sup>th</sup> Cir. 1983)

1 Case law provides guidance when assessing the matter of contempt.  
2 In addition to having a final order or judgment, in order for a party to be  
3 held in contempt and sanctioned for those acts of contempt, the Court  
4 must find that there is a clear and unambiguous order. "An order on which  
5 a judgment of contempt is based must be clear and unambiguous, and  
6 must spell out the details of compliance in clear, specific and  
7 unambiguous terms so that the person will readily know exactly what  
8 duties or obligations are imposed on him." *Cunningham v. District*  
9 *Court*, 102 Nev. 551, 559-60, 729 P.2d 1328, 1333-34 (1986).

10 As detailed in the attached Affidavit (with said terms incorporated  
11 herein), Chalese has consistently and egregiously violated nearly every  
12 order of this Court.

13 This Court clearly admonished Chalese at the June 17<sup>th</sup> hearing in  
14 telling her that her behavior posed a risk to the children's welfare and was  
15 preventing effective co-parenting between the parties. The fact Chalese  
16 did not learn from this strong admonishments by ***intentionally***  
17 ***depriving Adam of his time, manipulating the children,***  
18 ***refusing to keep the children away from marijuana, refusing***  
19 ***to drug test, interfering with drug testing, cursing and***  
20 ***disparaging Adam, threatening him with physical violence, as***  
21 ***well as having Josh do so, and attempting to interfere with his***

1 **work** only goes to show the Court that Chalese will not change. This is  
2 the situation despite Chalese having undergone co-parenting courses,  
3 which she recently bragged about learning so much from, and continues  
4 to exhibit severe animosity towards Adam, terrible judgment, selfish and  
5 reckless behavior in regard to the children. All of this prevents Chalese  
6 from being a joint custodian and effectively co-parenting with Adam.

7 Therefore, as Chalese's obligations were clear and it was within her  
8 power to abide by this Court's orders, she is in contempt of this Court's  
9 orders and must be sanctioned appropriately and to a degree that Chalese  
10 will be deterred from any future violations. Adam asks that this Court  
11 sanction Chalese by placing her in custody. This is not a case where there  
12 are just behavior order violations. This is a case where Chalese continually  
13 places the children in imminent danger, thumbs her nose at this Court,  
14 and has completely and utterly lied to and manipulated this Court for no  
15 other purpose than to further the criminal enterprise that is her life at this  
16 point.

17 **B. Adam Should be Awarded Attorney's Fees and Costs**

18 Chalese is the one who continuously and intentionally violates this  
19 Court's orders, thereby jeopardizing the safety of the children in the  
20 process and preventing her and Adam from co-parenting together. It is  
21 Chalese's conduct that has driven Adam to file this motion and seek the



1 help of the Court. Adam should therefore be made whole and not be forced  
2 to go out of pocket in order to protect his children's welfare. Adam shall  
3 submit a Memorandum of Fees and Costs addressing the *Brunzell* factors  
4 upon direction from the Court.

5 **III. CONCLUSION**

6 Based upon the foregoing, Adam respectfully requests that this  
7 Honorable Court grant the relief requested in this Motion, as well as any  
8 further relief the Court deems proper and just.

9 Dated Friday, February 21, 2020.

10 Respectfully Submitted:

11 THE ABRAMS & MAYO LAW FIRM

12 \_\_\_\_\_  
13 Vincent Mayo, Esq.  
14 Nevada State Bar Number: 8564  
15 6252 South Rainbow Blvd., Suite 100  
16 Las Vegas, Nevada 89118  
17 Attorney for Plaintiff

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**DECLARATION OF ADAM MICHAEL SOLINGER**

I, ADAM MICHAEL SOLINGER, do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

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

2. I make this Declaration in support of the foregoing *MOTION FOR AN ORDER TO SHOW CAUSE AND TO HOLD DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019 ORDER, AND THE BEHAVIOR ORDER FILED MARCH 19, 2019; FOR ATTORNEY'S FEES AND COSTS AND RELATED RELIEF.*

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

4. The Order from the March 19, 2019 hearing states that neither party shall use marijuana. Further, neither party shall consume alcohol 24 hours prior to and during their custodial timeshare with the children. The Order from the June 17, 2019 hearing states Chalese is to undergo

1 drug testing within 4 hours of being notified. I notified Chalese via text on  
2 August 7, 2019 that she needed to go in for drug testing but she refused  
3 to. I notified Chalese again on September 4, 2019 to test but she did only  
4 after buying and using drug detox products.

5 5. Chalese has allowed Josh to smoke marijuana around our  
6 children. Chalese continues to do so with Josh. When I was at the marital  
7 residence to pick up my items on July 17, 2019, I witnessed Josh drunk  
8 and high off a joint. I took a photo and video of this and Josh did not deny  
9 this fact at the January 8, 2019 TPO hearing when I made the statement.  
10 Chalese also testified during her deposition that Josh regularly drinks  
11 several beers every night.

12 6. The June 17, 2019 Order on page 5 states that Josh Lloyd was  
13 not to drive our children under any circumstances. Despite this, Josh was  
14 observed driving the children on several occasions since June 16, 2019,  
15 including September 14, 2019 and on Halloween night (October 31, 2019).  
16 Worse, Josh was observed by the PI driving the children the wrong way  
17 against traffic on a one-way street just to get where he was going faster.

18 7. The Behavior Order, page 1, states that neither party is to use  
19 abusive or foul language against the other. On page 2, it states that all  
20 friends, relatives and "significant others" of the parties are not to  
21 disparage, criticize or harass the other party. On page 2, it also states

1 neither party is to harass the other's place of employment nor post on  
2 social media any negative, disparaging or harassing statements to the  
3 other party. On page 3, neither party is to involve the children in the  
4 litigation. On page 4, it states that neither party shall threaten to commit  
5 nor commit any act of domestic violence on the other. It goes on to state  
6 that either party can have their parenting time limited if they are unable  
7 or unwilling to stop their significant other's behavior.

8 8. Since June 17, 2019 through the present, Chalese has called  
9 me the following:

- 10 - "mentally fucked";
- 11 - "a shitty person";
- 12 - "a low-life piece of shit";
- 13 - "a vile human being";
- 14 - "attention seeking snob"; and
- 15 - "Fuck you!"

16 9. Josh physically threatened to strike me on July 17, 2019.

17 10. Josh physically threatened to strike me on December 6, 2019,  
18 stating "I will knock you the fuck out!" and "Kick the shit out of you!", even  
19 trying to break into Jessica's truck while I was in it.

20 11. Chalese physically threatened to have Josh strike me, stating  
21

1 to me on July 18, 2019 that, *"If you'd like, Josh can come out there and*  
2 *explain it to you."*

3 12. Josh wrote a negative review on my firm's website on July  
4 2, 2019, stating that I was supposedly harassing him and Chalese and that  
5 I am supposedly involved in "childish bs."

6 13. Chalese and Josh have tried extorting me, telling me via text  
7 message from May 12, 2019 to "back off" or else he would tell my  
8 significant other that I supposedly have child pornography.

9 14. Josh told my son in November 2019 that Josh would "whoop  
10 his ass."

11 15. Chalese has continued claiming that I own child pornography,  
12 representing via text on October 2, 2019 to third parties that I did.

13 16. Josh's stepmother, Linda Overbay, contacted my employer on  
14 August 27, 2019, telling them that I should be fired and that if I did not  
15 sign documents allowing Chalese to buy a new residence, Ms. Overbay  
16 would post negative reviews of me on the firm web page and other social  
17 media.

18 17. Josh makes Facebook posts in which he demeans me and Ms.  
19 Sellers. Josh doesn't include my or Ms. Sellers' names but does include  
20 their initials, i.e. "A.S." (Adam Solinger) and "J.S." (Jessica Sellers).

21 ///

1           18. Chalese has told our son that I was bad for not letting Michael  
2 go to his old school and that “daddy is mean to mommy.” Michael said  
3 this to me on July 14, 2019. Michael stated, “mommy told me.” Michael  
4 said this before and again to me while we were in the car on August 27,  
5 2019.

6           19. The June 17, 2019 Order states that Chalese has visitation with  
7 the children on an alternating schedule; Wednesdays at 6:00 p.m. until  
8 Friday at 6:00 p.m. and the alternating week Fridays at 6:00 p.m. until  
9 Sundays at 6:00 p.m. The receiving parent is to pick the children up.

10          20. Per the June 17, 2019 hearing, I had the minor children on  
11 August 2, 2019 through 6:00 p.m. However, Chalese unilaterally picked  
12 them up from school at 3:38 p.m. on August 2, 2019 without my  
13 knowledge or permission which caused the children to believe I was lying  
14 about picking them up because I had promised to take them swimming.

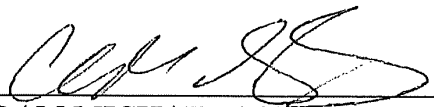
15          21. The June 17, 2019 Order on page 6 states that Chalese was to  
16 provide me proof of her valid vehicle registration and vehicle insurance.  
17 Chalese has not done so. What she provided previously was expired when  
18 it was provided and it did not list her as a driver.

19          22. That Josh did not deny at the January 8, 2020 TPO hearing  
20 that he drinks and smokes while Chalese has the children for her visitation  
21 time.

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23. I declare under penalty of perjury under the law of the State of Nevada, pursuant to Nev. Rev. Stat. 53.045, that the forgoing is true and correct.

Dated this 21st day of February, 2020.

  
ADAM MICHAEL SOLINGER

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *MOTION FOR AN ORDER TO SHOW CAUSE AND TO HOLD DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019 ORDER, AND THE BEHAVIOR ORDER FILED MARCH 19, 2019; FOR ATTORNEY'S FEES AND COSTS AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Friday, February 21, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Kristina C. Kirigin, Esq.  
Attorney for Defendant



---

An Employee of The Abrams & Mayo Law Firm



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/OPOSITION  
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"/>	<b>\$25</b> The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
	-OR-
<input checked="" type="checkbox"/>	<b>\$0</b> 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.

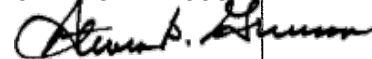
<input checked="" type="checkbox"/>	<b>\$0</b> The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>	The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>	The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
	-OR-
<input type="checkbox"/>	<b>\$129</b> 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"/>	<b>\$57</b> 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:					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>\$0</b>	<b>\$25</b>	<b>\$57</b>	<b>\$82</b>	<b>\$129</b>	<b>\$154</b>

Party filing Motion/Opposition: Plaintiff/Petitioner Date 02/21/2020

Signature of Party or Preparer *Juli Scher*



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](mailto:vmgroup@theabramslawfirm.com)  
Attorney for Plaintiff

6 Eighth Judicial District Court  
7 Family Division  
8 Clark County, Nevada

8 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D  
9 Plaintiff, ) Department: I  
10 vs. )  
11 CHALESE MARIE SOLINGER, ) Date of Hearing: 2/26/20  
12 Defendant. ) Time of Hearing: 3:00 p.m.  
13 )

14 **SUPPLEMENTAL APPENDIX OF EXHIBITS IN SUPPORT OF**  
15 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF THE**  
16 **COURT'S DECEMBER 9, 2019 DECISION; FOR PROOF OF**  
17 **CHALESE'S AUTO INSURANCE FOR THE LAST YEAR; AND**  
18 **RELATED RELIEF**

19 ///

20 ///

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///

<b>Exhibit</b>	<b>Description</b>
10	Chalese's January 4, 2020 interview of the children post on Facebook
11	Photos of Chalese and Josh dated January 12, 2020 and January 20, 2020 from Chalese's Facebook
12	Transcript from the January 8, 2020 hearing regarding the Temporary Protective Order

Dated Monday, February 24, 2020.

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 *SUPPLEMENTAL APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION OF THE COURT'S DECEMBER 9, 2019 DECISION; FOR PROOF OF CHALESE'S AUTO INSURANCE FOR THE LAST YEAR; AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Monday, February 24, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Kristina C. Kirigin, Esq.

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

EXHIBIT 10

EXHIBIT 10

EXHIBIT 10



**Chalese Anderson**

January 4 at 12:48 PM · 🌐



**\*\*KID INTERVIEW - No coaching..\*\***

- What's your name? Jesse /Maq
- How old are you? 6/4
- How old is your Mommy? 28...no 29/79
- How old is your Daddy? 28 /I don't know
- What's your favorite color? Blue/ black
- What's your favorite food? Broccoli /pancakes
- Who's your best friend? Chalese /Jesse
- What's your favorite song? Old town road/ fort night pro by do marshmallow
- What do you like to watch on tv? Spongebob square pants /the robot one!
- What's your favorite animal? Horse! Like Rivit / Maq Horse
- What are you scared of? Creepy clowns a little/ killer clowns
- What makes you Happy? Uhhh playing /when you hug me
- Where's your favorite place to go? Chuck E. Cheese /McDonald's
- What do want to be when you grow up? Cut hair, one stop flooring/ cut hair at cookie cutters, and a police officer
- What is love? That someone hearts you /when you love people with all your heart you love them
- Who loves you the most? Uhhh you and dad /charmer, mom, josh. and Jesse



Adam Solinger003762

EXHIBIT 11

EXHIBIT 11

EXHIBIT 11

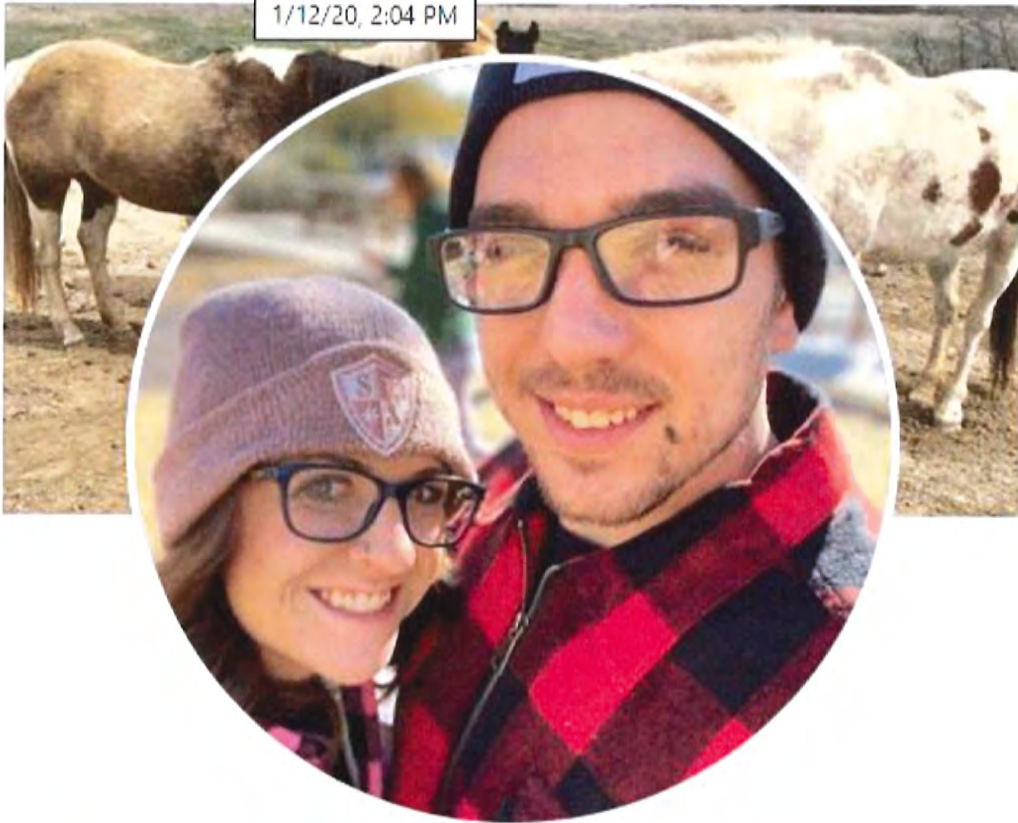


**Chalese Anderson** updated her profile picture.



January 12 at 2:04 PM · 🌐

1/12/20, 2:04 PM



Share

Adam Solinger003763

001839





Chalse Anderson

January 20



Share

Adam Solinger003769

001840

EXHIBIT 12

EXHIBIT 12

EXHIBIT 12

1

1 CASE NO: TPO  
 2 DEPT NO: 14  
 3  
 4 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP  
 5 COUNTY OF CLARK, STATE OF NEVADA  
 6  
 7  
 8 ADAM SOLINGER, )  
 9 Applicant, )  
 10 vs. ) CASE NO. 19PO19992  
 11 JOSHUA LLOYD, )  
 12 Respondent. )  
 13 \_\_\_\_\_ )  
 14  
 15 REPORTER'S TRANSCRIPT  
 16 OF  
 17 TEMPORARY PROTECTIVE ORDER  
 18 BEFORE THE HONORABLE AMY CHELINI  
 19 JUSTICE OF THE PEACE  
 20 Wednesday, January 8, 2020  
 21 10:00 a.m.  
 22  
 23 APPEARANCES:  
 24 For the Applicant ADAM SOLINGER, ESQ.  
 25 For the Respondent: JOSHUA LLOYD  
 PRO PER  
 Reported by: KRISTINE A. FLUKER, CCR NO. 403

3

1 this.  
 2 THE COURT: For the record, Mr. Solinger is  
 3 a defense attorney who has practiced in front of me. I  
 4 don't have any issue whatsoever hearing this. I'm just  
 5 disclosing that because I don't want there to be any  
 6 appearance of impropriety. I've got no issue with -- as  
 7 you know, I didn't realize this was him that was on  
 8 this. Okay?  
 9 So, Mr. Solinger, go ahead and tell me  
 10 what's going on.  
 11 Everybody keep it down.  
 12 MR. SOLINGER: So I'm in the process of  
 13 getting divorced, and as part of that there's custody  
 14 exchanges. At those custody exchanges, Mr. Lloyd has  
 15 frequently caused friction.  
 16 Most recently, about December 6th or so, I  
 17 was there to pick up my kids, pursuant to some vacation  
 18 time I noticed three months prior. My ex-wife denied  
 19 the kids. So I was calling Metro to make a report for a  
 20 standby for purposes of family court proceedings.  
 21 THE COURT: Sure.  
 22 MR. SOLINGER: Mr. Lloyd responds to the  
 23 scene because he wasn't there initially. He comes  
 24 running down the street like a mad man at my truck with  
 25 his camera right there and just starts immediately

2

1 LAS VEGAS, CLARK COUNTY, NEVADA, WED, JAN. 8, 2020  
 2 10:00 A.M.  
 3 PROCEEDINGS  
 4 THE COURT: Adam Solinger vs. Joshua Lloyd,  
 5 Case No. 19PO19992.  
 6 Good morning.  
 7 MR. SOLINGER: Good morning.  
 8 MR. LLOYD: Good morning, ma'am.  
 9 THE COURT: All right. Parties, state your  
 10 names for the record.  
 11 What's your name?  
 12 MR. LLOYD: Joshua Lloyd.  
 13 THE COURT: You're Joshua Lloyd. You go  
 14 over there. You're the adverse party.  
 15 Where's Adam Solinger?  
 16 MR. SOLINGER: Right here, Your Honor.  
 17 THE COURT: You're appearing for him?  
 18 MR. SOLINGER: No, I am him.  
 19 THE COURT: Oh, you are him.  
 20 MR. SOLINGER: Yeah. It's my TPO.  
 21 THE COURT: Oh, it's your TPO. Okay. All  
 22 right. This is from the Las Vegas Defense Group. All  
 23 right.  
 24 Mr. Solinger, I apologize. I'm not used to  
 25 seeing you doing this.  
 MR. SOLINGER: Well, I'm not used to doing

4

1 mouthing off.  
 2 He threatens to knock me the fuck out, kick  
 3 the shit out of me. He tries to open up my truck.  
 4 Thankfully it's locked at that point. He keeps talking,  
 5 running off.  
 6 He leaves for three to five minutes or so,  
 7 goes and gets in his vehicle, drives the wrong way  
 8 against traffic, head on at my vehicle, and stops about  
 9 a foot short of my bumper, and then proceeds to get out  
 10 of the car and get right next to my car again until the  
 11 police respond.  
 12 There's been numerous instances where he's  
 13 had conduct like this. He left a bad review on my  
 14 firm's website, saying I'm a terrible attorney, that I'm  
 15 harassing him and his family.  
 16 After that December 6th -- after that  
 17 December 6th incident, I went to family court, and as  
 18 part of that, Judge Moss issued a no-contact order  
 19 because she didn't believe she had the authority enter a  
 20 TPO, given that he was a non-party to the case.  
 21 THE COURT: Let's stop there. You started  
 22 getting going and I need to get you both sworn in before  
 23 we do this. I apologize.  
 24 So go ahead and get sworn in. Raise your  
 25 right hands.

5

1 Whereupon,  
2 ADAM SOLINGER AND JOSHUA LLOYD,  
3 having been first duly sworn to testify to the truth,  
4 the whole truth and nothing but the truth, testified as  
5 follows:  
6 THE COURT: All right. So go ahead. Why  
7 don't you just go ahead and start over. Well, let me  
8 ask a question really quick, Mr. Solinger.  
9 MR. SOLINGER: Of course.  
10 THE COURT: You indicated that you have this  
11 on tape or on your phone. It's recorded?  
12 MR. SOLINGER: Correct.  
13 THE COURT: All right. Where were the kids  
14 when this was happening?  
15 MR. SOLINGER: So my minor children were in  
16 my ex-wife's house at that point. I was with my  
17 girlfriend and her minor 16-year-old child. So I was in  
18 the passenger seat of my truck. My girlfriend was  
19 driving and her daughter was in the back seat.  
20 THE COURT: All right. And I hate to do  
21 this to you, but let's start from the beginning because  
22 now you're under oath and I don't want there to be any  
23 issues.  
24 MR. SOLINGER: Of course. I believe it was  
25 on or about December 6th, I was going to go pick my kids

6

1 as part of a custody exchange. It was not my normal  
2 custody time, but I had noticed some vacation time  
3 pursuant to a partial parenting agreement we had reached  
4 three months prior.  
5 So I was there. I had let her know the day  
6 before. I'd let her know that I was there. She said I  
7 wasn't going to get the kids and to just leave. I went  
8 around the corner because at that point I wanted to take  
9 a report regarding withholding for purposes of the  
10 family law case.  
11 THE COURT: Sure.  
12 MR. SOLINGER: Shortly thereafter,  
13 Mr. Lloyd, who was not present at the residence when I  
14 tried to get my children, came running down the street  
15 at my truck, pulled his phone out, and immediately he  
16 started talking and he said, "I'll knock you the fuck  
17 out. I'll beat the shit out of you," things to that  
18 nature.  
19 And then at one point he actually tries to  
20 open my vehicle you can hear it click in the vehicle.  
21 And Metro took a report for an attempt auto burglary for  
22 that, but I don't know if anything has been done with it  
23 at this point.  
24 He keeps kind of running his mouth, and then  
25 at that point I think he realizes that I'm on the phone

7

1 with Metro, trying to get them to come down. So he  
2 leaves and he goes and gets in his truck. He drives the  
3 wrong way against traffic, head on at my vehicle that's  
4 parked on the side of the road, and stops about a foot  
5 short of my bumper.  
6 He then gets out of the car and keeps  
7 talking until the police arrive. At which point, you  
8 know, I give them a statement, he gives a statement, I'm  
9 sure, and they take a report.  
10 In the months preceding this there's been  
11 some instances as well. At one point he wrote a bad  
12 review on my firm's website, talking about how I'm  
13 harassing him and his family, when I never said anything  
14 to him.  
15 As part of this case, shortly after this  
16 incident that kind of brought us here, I asked Judge  
17 Moss to issue a TPO because she's my family law judge.  
18 She thought she didn't have the authority to do it, as  
19 he's a non-party, so she issued a no-contact order.  
20 Then shortly after that, on December 11th,  
21 he messaged me at 5:53 p.m. saying, "Does your dad know  
22 he raised a pussy? Punk-ass bitch won't even be a man  
23 and talk. Nobody wants to beat you up, scary little  
24 boy. I was trying to have a conversation with you as a  
25 man, but your dad failed to raise one."

8

1 THE COURT: When was that?  
2 MR. SOLINGER: This was December 11th, after  
3 the no-contact order had been issued by Judge Moss.  
4 THE COURT: And this incident with the truck  
5 was December 7th?  
6 MR. SOLINGER: Yes. So in July there was  
7 also another incident where I was getting some of my  
8 property out of the former marital residence. My  
9 ex-wife had wanted to take some photos of things that I  
10 was taking, but, you know, I didn't have to. I didn't  
11 want to.  
12 I had been packing those things for 45  
13 minute to an hour, and she wasn't interested at all in  
14 being a part of that. So I refused. At which point he  
15 got in my face, made similar threats, saying he was  
16 going to kick my ass.  
17 He had to be restrained by my ex-wife, with  
18 his marijuana cigarette and his beer bottle in his hand.  
19 And that's also in the video.  
20 THE COURT: Okay. Sir, I appreciate you not  
21 interrupting, and that's kind of like how we like to do  
22 things. Now it's your turn. Go ahead, Mr. Lloyd, and  
23 tell me what's going on or what's your response?  
24 MR. LLOYD: I've been followed and harassed  
25 by Adam Solinger and up to five private investigators,

9

1 constantly making my life hell.  
2           There was a protective order granted for the  
3 harassment against him. This is what I'm recognizing as  
4 retaliation for that.  
5           THE COURT: Who issued a protective order?  
6           MR. LLOYD: Judge Moss.  
7           THE COURT: Did Judge Moss issue a  
8 protective order against you?  
9           MR. SOLINGER: No, not at all.  
10          THE COURT: All right. Go ahead.  
11          MR. LLOYD: That's because I was constantly  
12 being harassed and called to depositions and made late  
13 to pick up my daughter.  
14          He's gotten involved in my custody case with  
15 my daughter. He's contacted my ex-girlfriend since high  
16 school, just trying to -- you know, he's abusing his  
17 power as an attorney. And I said some things out of  
18 anger. There has not been contact since this issue.  
19 And --  
20          THE COURT: What about the text you just  
21 sent about his dad raising a you-know-what?  
22          THE DEFENDANT: I was just trying to talk to  
23 him. And in the video --  
24          THE COURT: Well, it's kind of hard to have  
25 a conversation with somebody when you call them the "P"

10

1 word, right?  
2           MR. LLOYD: Yeah.  
3           THE COURT: Well, you can have a  
4 conversation, but it's probably not going to be a  
5 productive one, right?  
6           MR. LLOYD: Correct. There's been multiple  
7 things. Like I said, he got involved in my custody case  
8 with my daughter.  
9           And I have on paper that him and her have an  
10 agreement. I don't know what kind of agreement he's  
11 trying to make with her. But there's been quite a few  
12 things. But, like I said, since this issue, there  
13 hasn't been any contact.  
14          THE COURT: What about you chasing down the  
15 truck, trying to get in his truck, going the wrong way?  
16          MR. LLOYD: I didn't try and get in his  
17 truck. I told him in the beginning of the video, if  
18 you'd like to view it, that if you have the paperwork to  
19 pick up the children -- she's constantly distraught, you  
20 know, scared to come out of the house because of what  
21 he's done so far. So at this point I'm not really  
22 trying to be involved.  
23          THE COURT: That's a pretty good idea.  
24          MR. LLOYD: I've been involved. He's made  
25 me involved. He's been making the divorce about me

11

1 because he's trying to take the kids from her, and she  
2 has no issues.  
3           THE COURT: Well, then I'm assuming  
4 probably, like, you see now it's your girlfriend, right?  
5           MR. LLOYD: Correct.  
6           THE COURT: She's upset, you get upset, and  
7 go at him, right?  
8           MR. LLOYD: I'm not going to hit him though.  
9 I said --  
10          THE COURT: I mean go at him.  
11          MR. LLOYD: I said some things out of anger  
12 and I asked him if --  
13          THE COURT: That's what I'm saying. You get  
14 upset and then you see her upset and then you react.  
15          MR. LLOYD: Yeah, when my kids and his kids  
16 are watching her cry every day because of the things  
17 that they're going through.  
18          THE COURT: That's why I don't do family  
19 law. It's about everybody except the kids, it seems.  
20          Let me see the phone.  
21          MR. SOLINGER: May I approach?  
22          THE COURT: Sure, of course.  
23          Sir, you can come up, if you want, too.  
24          MR. LLOYD: In the beginning of the video  
25 you can hear me say, "I will get the kids personally. I

12

1 will go in there. If you have the paperwork, if you  
2 want to show me, whatever, I will go in and get the kids  
3 personally and bring them out to you."  
4           MR. SOLINGER: This is the first video. If  
5 you want to hit play.  
6           MR. LLOYD: There was only one video, so  
7 something may have been erased out of that.  
8           (Whereupon, a video was played.)  
9           MR. LLOYD: I made a phone call to the  
10 police too as well. That's why I stopped in front of  
11 his vehicle, to make sure he was present when they  
12 showed up.  
13          (Video continues playing.)  
14          MR. LLOYD: That was me, in an attempt to  
15 help him get the kids back.  
16          (Video continues playing.)  
17          MR. LLOYD: And I was on the phone with  
18 Metro too as well.  
19          (Video continues playing.)  
20          THE COURT: I want to get to the part where  
21 he comes at the truck.  
22          MR. SOLINGER: Where he drives at it?  
23          THE COURT: Yes.  
24          MR. LLOYD: Yeah, that's where it started.  
25 That should have been the video that was produced.

13

1 MR. SOLINGER: So if you hit play, his  
 2 daughter was able to get the very tail end of it because  
 3 we weren't --  
 4 MR. LLOYD: That was just me making sure he  
 5 didn't leave the scene while Metro was on the way.  
 6 (Whereupon, a video is played.)  
 7 THE COURT: All right. When is the last  
 8 contact you've had with Mr. Solinger?  
 9 MR. LLOYD: That text message.  
 10 THE COURT: That text message?  
 11 MR. LLOYD: Yes, ma'am.  
 12 THE COURT: When was it written?  
 13 MR. SOLINGER: December 11th.  
 14 THE COURT: December 11th. Okay.  
 15 Sir, you drove up -- I mean, thank God that  
 16 Mr. -- listen, it's clear to me what's going on. This  
 17 isn't about -- it's a divorce, and divorces are nasty  
 18 sometimes. And this one, apparently, clearly is.  
 19 And emotions get high, but you can't drive  
 20 up on someone like that. I mean, you're lucky -- if it  
 21 was anyone -- you're lucky it wasn't someone who had a  
 22 temper, like me, and got out of the car, with a gun.  
 23 MR. LLOYD: My intentions were to make sure  
 24 he didn't leave the scene before Metro had arrived  
 25 there.

14

1 THE COURT: You can't drive the wrong way on  
 2 the street and just damn near hit somebody. I mean, you  
 3 were like this close to hitting him.  
 4 MR. LLOYD: I pulled over onto the side of  
 5 the road. I had no intentions of hitting the vehicle.  
 6 THE COURT: Okay. I get what you're saying.  
 7 And I -- this isn't about -- I mean, between the text  
 8 messages and your conduct on that day, and I understand  
 9 you're saying that there's other stuff that's happened,  
 10 cut I don't have that in front of me. All I have is  
 11 what's in front of me for the TPO. Okay?  
 12 MR. LLOYD: Yes, ma'am.  
 13 THE COURT: You understand what I'm saying?  
 14 MR. LLOYD: Yes, ma'am.  
 15 THE COURT: So this is just -- I'm going to  
 16 grant it for 45 days. Just stay away from him.  
 17 MR. LLOYD: Yes, ma'am.  
 18 THE COURT: That's all you have to do.  
 19 MR. LLOYD: Yes, ma'am.  
 20 THE COURT: Okay? Here's the thing. You  
 21 stay away from him, nothing's going to happen, right?  
 22 MR. LLOYD: Correct. Yes, ma'am.  
 23 THE COURT: But if there's an issue, then he  
 24 calls the police and you could be subject to getting  
 25 arrested now.

15

1 MR. LLOYD: Yes, ma'am.  
 2 THE COURT: So just please stay away from  
 3 him. The issue that's going on between his ex-wife,  
 4 whatever the situation may be, I understand that you're  
 5 protective of her, she's your girlfriend --  
 6 MR. LLOYD: I'm being brought into it. I've  
 7 been deposed and called to trial and all that.  
 8 THE COURT: Well, this doesn't help anyone.  
 9 MR. LLOYD: Understood.  
 10 THE COURT: It doesn't help Mr. Solinger.  
 11 Clearly it's not helping your kids. And it's not going  
 12 to help the situation, period.  
 13 So I'm going to grant it for 45 days. And I  
 14 hope this is the last of it. Now, if there's another  
 15 incident and you feel the need to file something, file  
 16 something. If you feel the need to call the police --  
 17 this is just a piece of paper. You know this?  
 18 MR. SOLINGER: Yes.  
 19 THE COURT: It's not going to do anything  
 20 other than give him the liability. But stay away. And  
 21 it's going to -- I think it will help you as well.  
 22 MR. LLOYD: Absolutely. Like I said, I've  
 23 had private investigators following me. I have pictures  
 24 of the inside of my vehicle, pictures of the inside of  
 25 my house, which I'm not a hundred percent sure is legal

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1 or not. I'm not an attorney. But it's just constantly.  
 2 And that's why she granted the protective order, to keep  
 3 me from missing work, being late to pick up my daughter  
 4 and my kids after school.  
 5 THE COURT: You might want to double check  
 6 that about the protective order because I don't know  
 7 that Judge Moss would have the jurisdiction to do that.  
 8 MR. SOLINGER: To be clear, there is no  
 9 protective order. What had happened is my attorney gave  
 10 the wrong documents to serve on him for a deposition.  
 11 He moved to quash the deposition subpoena on the grounds  
 12 that it was untimely with the discovery cutoffs. And so  
 13 the discovery commissioner said that there would be no  
 14 deposition because of the discovery issue. Not that  
 15 there was a protective order or anything like that.  
 16 Just that there would be no deposition. But the  
 17 discovery cutoff has been moved, so any kind of order  
 18 would be moot.  
 19 THE COURT: All right. Well, here's the one  
 20 thing I want to get clear because right now --  
 21 obviously, Mr. Solinger, you're sharing custody with  
 22 your wife, ex-wife. Is she your ex-wife or still your  
 23 wife?  
 24 MR. SOLINGER: We're still technically  
 25 married.

17

1 THE COURT: Okay. So you're sharing  
2 custody. Are you living with the ex?  
3 MR. LLOYD: Correct. We have a house.  
4 THE COURT: So I'm not going to violate him  
5 -- I don't want games being played where you go to pick  
6 up the kids and he happens to be in the living room, and  
7 you say, oh, now he's violating. You know what I'm  
8 saying?  
9 MR. SOLINGER: No, I understand. As long as  
10 he does not leave the residence while I'm there to pick  
11 up the kids.  
12 THE COURT: Yes. So you will not be in  
13 violation of this TPO, as long as you stay in the  
14 residence when he's doing the pickup.  
15 MR. LLOYD: Absolutely.  
16 THE COURT: I'm assuming you're not going in  
17 the residence?  
18 MR. SOLINGER: Correct. I send a message  
19 from outside, and the kids come out.  
20 THE COURT: Okay. As long as we do that,  
21 because otherwise I can't stand it when stuff is being  
22 done.  
23 MR. LLOYD: Absolutely.  
24 THE COURT: So if you stay inside, that's  
25 fine. If you come outside and you start yelling, the

18

1 cops are going to get called and you're going to get in  
2 trouble.  
3 MR. LLOYD: Things were high. Emotions were  
4 high, you know.  
5 THE COURT: I understand.  
6 MR. LLOYD: She had went -- she had seen him  
7 maybe once in December, but she was without the kids for  
8 two weeks. He dropped them off for less than 24 hours.  
9 And I was, you know watching her cry as he was --  
10 THE COURT: Believe me, you don't have to  
11 explain emotions getting high to me.  
12 MR. LLOYD: That's where a lot of it stems  
13 from.  
14 THE COURT: Believe me, I get it. But I  
15 think this will work out better for everybody. Just  
16 stay in the house.  
17 She's going to make sure she puts that on  
18 the order that you're allowed to be at the residence  
19 during the custody exchange; however, you're not allowed  
20 to come out of the residence. Okay?  
21 MR. LLOYD: Yes, ma'am.  
22 THE COURT: Don't mess around with this.  
23 MR. LLOYD: And does it expire after 45  
24 days?  
25 THE COURT: Well, we're going to have

19

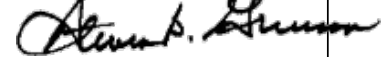
1 another hearing. If there's no other issues, then we'll  
2 be done. If there's other issues, then they can move to  
3 request for me to extend it for a year.  
4 MR. LLOYD: Yes, ma'am.  
5 THE COURT: Actually up to two years.  
6 MR. LLOYD: Yes, ma'am.  
7 THE COURT: Mr. Solinger, Jessica Sellers  
8 and Courtney Sellers, I can't cover them. They don't  
9 live with you. This is just for you.  
10 MR. SOLINGER: Of course.  
11 THE COURT: So it applies to you. So have a  
12 seat we're going to get you the order. She has to make  
13 some changes on it. Okay?  
14 MR. LLOYD: Thank you, ma'am.  
15 THE COURT: I hope everything works out,  
16 Mr. Solinger.  
17 MR. SOLINGER: I appreciate it. Thank you.  
18 -oOo-  
19 ATTEST: FULL, TRUE AND ACCURATE TRANSCRIPT OF  
20 PROCEEDINGS.  
21  
22  
23 /S/Kristine Fluker  
24 \_\_\_\_\_  
25 KRISTINE A. FLUKER, CCR NO. 403

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<p><b>R</b></p> <p>raise [2] - 4:24, 7:25  <b>raised</b> [1] - 7:22  <b>raising</b> [1] - 9:21  <b>reached</b> [1] - 6:3  <b>react</b> [1] - 11:14  <b>realize</b> [1] - 3:7  <b>realizes</b> [1] - 6:25  <b>really</b> [2] - 5:8, 10:21</p>	<p><b>S</b></p> <p>scared [1] - 10:20  <b>scary</b> [1] - 7:23  <b>scene</b> [3] - 3:23, 13:5, 13:24  <b>school</b> [2] - 9:16, 16:4  <b>seat</b> [3] - 5:18, 5:19, 19:12  <b>see</b> [3] - 11:4, 11:14, 11:20  <b>seeing</b> [1] - 2:24  <b>Sellers</b> [2] - 19:7, 19:8  <b>send</b> [1] - 17:18  <b>sent</b> [1] - 9:21  <b>serve</b> [1] - 16:10  <b>sharing</b> [2] - 16:21, 17:1  <b>shit</b> [2] - 4:3, 6:17  <b>short</b> [2] - 4:9, 7:5  <b>shortly</b> [3] - 6:12, 7:15, 7:20  <b>show</b> [1] - 12:2  <b>showed</b> [1] - 12:12  <b>side</b> [2] - 7:4, 14:4  <b>similar</b> [1] - 8:15  <b>situation</b> [2] - 15:4, 15:12  <b>SOLINGER</b> [30] - 1:8, 1:21, 2:6, 2:15, 2:17, 2:19, 2:25, 3:12, 3:22, 5:2, 5:9, 5:12,</p>	<p><b>T</b></p> <p>tail [1] - 13:2  <b>tape</b> [1] - 5:11  <b>technically</b> [1] - 16:24  <b>temper</b> [1] - 13:22  <b>TEMPORARY</b> [1] - 1:15  <b>terrible</b> [1] - 4:14  <b>testified</b> [1] - 5:4  <b>testify</b> [1] - 5:3  <b>text</b> [4] - 9:20, 13:9, 13:10, 14:7  <b>thankfully</b> [1] - 4:4  <b>THE</b> [88] - 1:4, 1:16, 1:17, 2:8, 2:12, 2:16, 2:18, 2:20, 3:2, 3:21, 4:21, 5:6, 5:10, 5:13, 5:20, 6:11, 8:1, 8:4, 8:20, 9:5, 9:7, 9:10,</p>	<p><b>U</b></p> <p>under [1] - 5:22  <b>understood</b> [1] - 15:9  <b>untimely</b> [1] - 16:12  <b>up</b> [14] - 3:17, 4:3, 7:23, 8:25, 9:13, 10:19, 11:23, 12:12, 13:15, 13:20, 16:3, 17:6, 17:11, 19:5  <b>upset</b> [4] - 11:6, 11:14</p>	
				<b>V</b>
				<p>vacation [2] - 3:17,</p>



1 **OBJ.**  
2 **Kristina C. Kirigin, Esq.**  
3 Nevada Bar No. 9082  
4 **vegas west attorneys**  
5 5594 S. Fort Apache Road, Suite 120  
6 Las Vegas, Nevada 89148  
7 Telephone: (702) 629-7553  
8 Facsimile: (702) 629-2276  
9 Email: [kristina@vegaswestattorneys.com](mailto:kristina@vegaswestattorneys.com)  
10 *Attorneys for Defendant*

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

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

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

19 Dept. No. **I**

20 **DEFENDANT'S OBJECTION TO PLAINTIFF'S SUPPLEMENTAL APPENDIX OF**  
21 **EXHIBITS IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION OF THE**  
22 **COURT'S DECEMBER 9, 2019 DECISION, ETC.**

23 COMES NOW Defendant, Chalese Marie Solinger, by and through her  
24 attorney, Kristina C. Kirigin, Esq., of VEGAS WEST ATTORNEYS, and pursuant to  
25 NRCPC 16.2 hereby objects to the authenticity of the following documents  
26 produced by Plaintiff as follows:

- 27 1. Chalese's January 4, 2020 interview of the children post on Facebook,  
28 Exhibit 10;

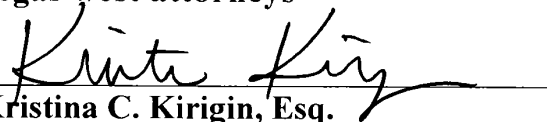
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2. Photos of Chalese and Josh dated January 12, 2020 and January 20, 2020 from Chalese's Facebook, Exhibit 11; and
3. Transcript from the January 8, 2020 hearing regarding the Temporary Protective Order, Exhibit 12.

Pursuant to NRCP 16.2(h), objections to authenticity are waived unless made within 21 days of the production of document.

DATED this 24<sup>th</sup> day of February 2020.

**vegas west attorneys**



**Kristina C. Kirigin, Esq.**

Nevada Bar No. 9082

5594 S. Fort Apache Road, Suite 120

Las Vegas, Nevada 89148

Telephone: (702) 629-7553

Facsimile: (702) 629-2276

Email: [kristina@vegaswestattorneys.com](mailto:kristina@vegaswestattorneys.com)

*Attorneys for Defendant*

1 CERTIFICATE OF SERVICE

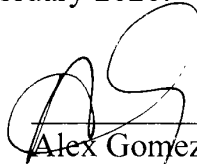
2 Pursuant to NRCP 5(b), I hereby certify that a true and correct copy of  
3 **DEFENDANT'S OBJECTION TO PLAINTIFF'S SUPPLEMENTAL**  
4 **APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S MOTION**  
5 **FOR RECONSIDERATION OF THE COURT'S DECEMBER 9, 2019**  
6 **DECISION, ETC.** in the above-captioned case was served this date as follows:  
7

- 8  pursuant to NEFCR 9, by mandatory electronic service through the  
9 Eighth Judicial District Court's electronic filing system;
- 10  by placing the same to be deposited for mailing in the United  
11 States Mail, in a sealed envelope upon which first class postage was  
12 prepaid in Las Vegas, Nevada;
- 13  pursuant to EDCR 7.26 to be sent via facsimile, by duly executed  
14 consent for service by electronic means;
- 15  by hand-delivery with signed Receipt of Copy.

16 To attorney(s) listed below at the address:

17 Vincent Mayo, Esq.  
18 **THE ABRAMS & MAYO LAW FIRM**  
19 E-mail: vmgroup@theabramslawfirm.com  
20 *Attorneys for Plaintiff*

21 DATED this 14<sup>th</sup> day of February 2020.

22   
23 \_\_\_\_\_  
24 Alex Gomez  
25 An employee of **vegas west attorneys**  
26

# DISTRICT COURT

Family Division  
CLARK COUNTY, NEVADA

FILED IN OPEN COURT

2-26, 2020

STEVEN D. GRIERSON  
CLERK OF THE COURT

BY: [Signature] DEPUTY

Adam Solinger  
Plaintiff,

-vs-

Chalese Solinger  
Defendant.

CASE NO: D-19-58224S-D

DEPT. I

**REQUEST FOR CHILD PROTECTION  
SERVICES APPEARANCE AND RECORDS**

Mother Chalese Solinger (Mother's name) Father Adam Solinger (Father's name)

Child(ren)'s Name Marie Solinger (Child's name) (8/28/17) Michael Solinger (Child's name) (6/16/15)

**NOTICE TO APPEAR:**

- NOTICE to Appear to Caseworker \_\_\_\_\_ (Caseworker's name)
- NOTICE to Appear to CPS Representative

*This Notice is to be submitted to CPS at least 72 hours prior to court hearing, except in emergency situations.*

NOTICE to Appear at Court Hearing:  
Date \_\_\_\_\_ Time \_\_\_\_\_ Dept \_\_\_\_\_

Type of Hearing \_\_\_\_\_ Bring Records  Yes  No

NOTICE to Provide Records Only by \_\_\_\_\_, 20\_\_\_\_ (Date)

Records to be delivered to: Dept. I  
Other Information \_\_\_\_\_

DATED this \_\_\_\_\_ day \_\_\_\_\_ 20\_\_\_\_.

[Signature]  
FAMILY COURT JUDGE/HEARING MASTER

FILED IN OPEN COURT

FEB 26 2020

STEVEN D. GRIERSON  
CLERK OF THE COURT

1 NSSC

2  
3 BY  DEPUTY  
ERICA JIMENEZ

4 DISTRICT COURT  
5 CLARK COUNTY, NEVADA

6 \*\*\*\*\*

7 Adam Michael Solinger, Plaintiff

CASE NO: D-19-582245-D

8 vs.

9 Chalese Marie Solinger, Defendant.

10 Department I

11  
12 **ORDER REFERRING TO JUDICIAL SETTLEMENT PROGRAM**

13 EDCR 5.524 provides that “the court may order the parties to participate  
14 in a settlement conference.” This Court finds that this case is appropriate for  
15 referral to the Judicial Settlement Program for a three-hour setting.  
16

17 It is therefore ORDERED that all parties and retained counsel shall  
18 appear for a Settlement Conference on the 9th day of June, 2020 at 1:30 p.m..  
19 All parties must comply with the requirements of EDCR 5.524. The parties shall  
20 be notified of the location of the Settlement Conference seven calendar days  
21 prior to the Settlement Conference.  
22

23 It is further ORDERED that Confidential Settlement Briefs are due to  
24 the Settlement Judge at least seven (7) full judicial days before the scheduled  
25 settlement conference. Pursuant to EDCR 5.524, Settlement Briefs should be  
26 no longer than ten (10) pages (exclusive of asset and debt  
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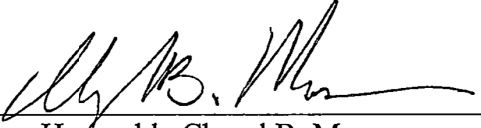
summaries/schedules/balance sheets) and comply with the requirements of EDCR 5.524.

It is further ORDERED that both parties shall file and serve a Financial Disclosure Form at least 72 hours prior to the Settlement Conference with current financial information.

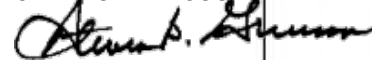
It is further ORDERED that, if the division of assets (real property, vehicles, businesses, pensions, etc.) and debts has not been completely resolved, each party shall bring documents (comparable values, appraisals, statements of account, etc.) demonstrating the value of each contested asset and debt.

It is further ORDERED that failure to comply with this order shall result in sanctions that may include monetary sanctions.

FEB 26 2020

  
\_\_\_\_\_  
Honorable Cheryl B. Moss  
Department I





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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

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

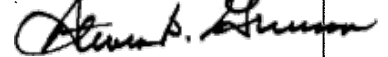
14 **RECEIPT OF CHECK**

15 I hereby acknowledge receipt of check number 24909, in the  
16 amount of four hundred dollars (\$400.00) made payable to Expert Data  
17 Forensics, LLC, as and for record in response to subpoena.

18 Dated this 27 day of February, 2020.



An employee of Expert Data Forensics, LLC  
5701 N. Rainbow Blvd., Suite 180  
Las Vegas, Nevada 89130



1 **OPPS**  
2 **Kristina C. Kirigin, Esq.**  
Nevada Bar No. 9082  
3 **vegas west attorneys**  
4 5594 South Fort Apache Road, Suite 120  
Las Vegas, Nevada 89148  
5 Telephone: (702) 629-7553  
6 Facsimile: (702) 629-2276  
Email: [Kristina@vegaswestattorneys.com](mailto:Kristina@vegaswestattorneys.com)  
Attorneys for Plaintiff

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

10 **Adam Michael Solinger,**

11 Plaintiff,

12 vs.

13 **Chalese Marie Solinger,**

14 Defendant.

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

Dept. No. **I**

Date of Hearing: **April 7, 2020**

Time of Hearing: **9:30 a.m.**

15  
16  
17 **OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW**  
18 **CAUSE AND TO HOLD DEFENDANT IN CONTEMPT OF COURT FOR**  
19 **VIOLATION OF THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019**  
20 **ORDER, AND THE BEHAVIOR ORDER FILED MARCH 19, 2019; FOR**  
21 **ATTORNEY'S FEES AND COSTS AND RELATED RELIEF AND**  
22 **COUNTERMOTION TO ENFORCE PHONE CONTACT WITH THE MINOR**  
23 **CHILDREN AND FOR ATTORNEY'S FEES**

24 COMES NOW Defendant **Chalese Marie Solinger**, by and through her  
25 attorney, **Kristina C. Kirigin, Esq.**, of **vegas west attorneys** and hereby moves  
26 this Honorable Court for the following relief:

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1. Denying Plaintiff's MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT;

2. For an Order Confirming that Plaintiff must allow phone contact between the minor children and their mother;

3. For an Order that all weekday custody exchanges will take place at the children's daycare; and

4. Awarding Defendant such other and further relief as this court deems just and proper in the premises.

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

DATED this 16<sup>th</sup> day of March, 2020.

**vegas west attorneys**

  
**Kristina C. Kirigin Esq.**

Nevada Bar No. 9082  
5594 South Fort Apache Road, Suite 120  
Las Vegas, Nevada 89148  
Attorney for Defendant

1 **I. POINTS AND AUTHORITIES**

2 **A. STATEMENT OF FACTS**

3 Plaintiff **Adam Michael Solinger** (“Adam”) and Defendant **Chalese Marie**  
4 **Solinger** (“Chalese”) were married on May 12, 2012, in Las Vegas. There are  
5 two minor children of the marriage: **Michael Solinger**, born June 16, 2015 and  
6 **Marie Solinger**, born August 28, 2017.  
7

8 Adam is an attorney in Las Vegas, employed with Las Vegas Defense  
9 Group. He receives a salary of \$120,000.00 per year, plus bonuses of  
10 approximately \$3,000.00 per year, for monthly wages of \$10,250.00. At the last  
11 hearing on February 26,2020, Adam informed the Court that he had accepted a  
12 new job and would be making \$85,300.00 per year as of March 16, 2020,  
13 voluntarily reducing his pay approximately \$37,700.00, while this action is  
14 pending.  
15

16 Through most of the parties’ marriage, Chalese was a homemaker and  
17 worked only sporadically, never earning more than \$20,000.00 per year. Since the  
18 parties’ separation, Chalese has found employment cutting children’s hair. Her  
19 gross monthly income is \$1,442.43. Chalese has struggled financially  
20 throughout this divorce action and Adam was ordered to pay her temporary  
21 support of \$1,125.00 per month on December 9, 2019. Instead of paying Chalese  
22 the temporary support he knew she desperately needed, Adam filed a Motion for  
23 Reconsideration on December 27, 2019. Adam did not pay Chalese any support  
24 while his motion was pending, which was heard on February 26, 2020.  
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1           The parties were last before the Court on February 26, 2020 for Adam's  
2 Motion for Reconsideration. Before that motion was even heard, Adam filed the  
3 instant motion. Adam has consistently received financial assistance from his  
4 father, in addition to earning more than four (4) times Chalese's income. During  
5 Adam's deposition, he admitted that his father has gifted him over \$40,000.00 for  
6 attorney's fees and at least \$10,000.00 to hire a private investigator. Adam has  
7 had the benefit of unlimited resources and is clearly trying to gain the upper hand  
8 in this case with excessive litigation.  
9

10           Since Adam filed his Complaint for Divorce on January 4, 2019, the parties  
11 have been before the Court for hearings ten (10) times, which means they have  
12 been in court almost every month for the last year. None of the alleged violations  
13 in Adam's motion are recent and all have been addressed by the Court at prior  
14 hearings. For example, Adam filed an Emergency Motion for Change of  
15 Custody on May 15, 2019.  
16

17           **Chalese has not Withheld the Children and Adam Continues to**  
18 **Unilaterally Parent.**

19           Adam has already obtained temporary primary custody, yet he seeks to use  
20 the same allegations which were previously litigated to further reduce Chalese's  
21 time with their children. His motion cites February 2019 and August 2019 as  
22 times she withheld. The parties have been to Court multiple times since February  
23 2019 and this allegation is prior to several custody orders. Adam claims that  
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1 Chalese picked the children up at 3:38 p.m. on August 2, 2019, when her time  
2 began at 6:00 p.m. Since Chalese was off work early and was picking the  
3 children up from daycare, she believed that she could pick them up early. Adam  
4 has stated that he works until at least 5:00 p.m., thus Chalese was not taking any  
5 time away from him. This was a one time misunderstanding, not a violation of  
6 the order. In bad faith, Adam has told the daycare that Chalese is not permitted to  
7 pick up and the daycare has been hostile to Chalese. Further, Adam has been  
8 picking up the children or having his girlfriend pick them up from daycare on  
9 Chalese's custodial time so that she has to go to his home. Adam lives in a gated  
10 neighborhood and Chalese often has to wait at the gate due to Adam or his  
11 girlfriend not answering the phone. In addition, Adam is the party who has  
12 withheld custody and even refused to allow Chalese make up time when she was  
13 sick.  
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17 The alleged incident between Josh and Adam in December 2019, has now  
18 been heard by the Court on two(2) occasions, yet Adam brings it up a third time.  
19 Adam has not provided any proof that requested vacation time in December 2019  
20 and in fact his motion does not even include the date. Josh did go outside to ask  
21 Adam to leave when he refused to do same. Adam should not be permitted to  
22 try to use this incident for a third time in Court. Further, this incident did not  
23 involve Chalese and did not take place in front of the children.  
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1 Chalese will admit that there was confusion over the December holiday  
2 plan. Adam initially asked her to switch Christmas eve for Christmas day and  
3 she thought they agreed upon same. When she did not pick up the children for  
4 Christmas eve, Adam refused to allow her any time on Christmas day. Chalese  
5 should have had custody on December 26-27, 2019, but Adam claims he notified  
6 her that he was taking vacation days. Thereafter, Adam claimed he had the  
7 children until January 3, 2020. Adam's action of taking vacation time right after  
8 the Christmas holiday, meant that he was able to keep the children from December  
9 24, 2019 through January 3, 2020, effectively keeping the children from their  
10 mother for ten (10) days. Adam's claim that Chalese picked up the children a  
11 couple hours early in August 2019, when he recently kept the children from her  
12 for ten(10) days is disingenuous.

15 When Chalese agreed several months ago to put the children in a less  
16 expensive daycare, Adam enrolled them in the daycare of his choice, by his home.  
17 Despite multiple requests from Chalese, he refuses to enroll the children in a  
18 daycare that both parties agree upon. Next, Adam turned Marie's car seat to  
19 forward facing prior to her second birthday on August 28, 2019. When Chalese  
20 asked Adam to please leave Marie rear facing, at least until her second birthday,  
21 he refused. The parties kept their son rear facing in his car seat until his second  
22 birthday, but Adam refused to do the same for Marie. (See Appclose Messages  
23 on 6-23-19 attached as **Exhibit "A"**).

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**Adam delays or refuses to allow phone calls**

Per the Partial Parenting Plan, the parties agreed upon 7:00 p.m. as the time the non-custodial parent could call the children. This time was selected to be after dinner and before bedtime. However, Adam often claims the kids are having dinner at 7:00 p.m. then go to bed before they can call. Chalese can produce phone records detailing that her calls to the children at 7:00 p.m. go unanswered or that the calls are so brief she barely gets to speak to the children. (See Appclose Messages on 8-26-19 attached as **Exhibit “B”** and (See Appclose Messages on 10-20-19 attached as **Exhibit “C”**). She understands that the children are young and does not expect long phone calls. However, both children are capable of and generally want to speak on the phone for at least 5 minutes. Chalese knows that the children can do this because she has them available for Adam’s calls. For these reasons, Chalese requests that the Court enforce the order for phone calls with the minor children.

**Chalese does not have a marijuana addiction**

After marijuana was legal, Chalese obtained a medical marijuana card for endometriosis. Thereafter, she used legal marijuana occasionally. Despite the fact that Adam has a girlfriend, he took an instant dislike to Chalese’s boyfriend Josh, which is the real reason that Adam has requested drug tests. Chalese should not be subject to random drug tests for a legal substance and Adam has used this as yet another way to interfere with Chalese’s custodial time. Josh does use



1 marijuana, which is legal, but does not use around the children. Adam claims  
2 that Josh did not deny that he “drinks and smokes while Chalese has the children”  
3 at the TPO hearing on January 8, 2020. The TPO hearing transcript does not  
4 show that Josh had an opportunity to deny same or that he admitted to Adam’s  
5 allegations. Once again, Adam expects the Court to believe that every statement  
6 he makes, without proof, is true. Adam does not have any personal knowledge  
7 about whether Josh consumes alcohol or smokes while Chalese has the children.  
8 Further, since Josh is never a caretaker for the children and never alone with them,  
9 this is irrelevant.  
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12 Despite the fact that marijuana is legal in Nevada, Adam made a request  
13 many months ago to have Chalese drug tested. He has used this order to further  
14 harass Chalese. For example, on August 7, 2019, a day where Chalese was  
15 scheduled to pick up the kids after work, Adam notified her at 2:56 p.m. that he  
16 wanted her to drug test. Adam’s timing was specifically set to interfere with  
17 Chalese’s custodial time. Further, the location where Chalese takes tests is only  
18 open until 6:00 p.m., thus he only gave her two (2) hours notice to test. If Adam  
19 had actually been concerned about drug use, he would have asked Chalese to test  
20 the day before she picked up the children.  
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23 **Chalese has not allowed Josh to drive the minor children since the June**

24 **17, 2019 Order**

1 Chalese admitted and this Court already heard same, that she did allow Josh  
2 to drive with good cause prior to the June 17, 2019 Order. Adam's actions of  
3 having Chalese followed by a private investigator have caused her to suffer from  
4 anxiety. Chalese only allowed Josh to drive because she took her prescription  
5 medication and felt that it could affect her ability to drive. As such, for the  
6 children's safety, she allowed Josh to drive on that occasion **prior** to the July 17,  
7 2019 hearing. Since the hearing on June 17, 2019 Josh has not driven the  
8 children. While Josh has been in the vehicle with Chalese, she has always been  
9 the driver when the children are with her. Adam's allegations that Josh drove the  
10 children on September 14, 2019 and October 31, 2019 are false. Adam does not  
11 have new evidence of Josh driving the children because this has not occurred.  
12 Adam should not be permitted to re-litigate issues which have already been  
13 addressed by this Court.

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17 **Any Alleged Violations of the Behavior Order should be Addressed at**

18 **Trial**

19 Chalese has informed her family and Josh to abide by the behavior order.  
20 However, Chalese cannot control each and every comment from those who  
21 witness Adam's attacks on her. Further, Adam has antagonized Josh and takes  
22 no responsibility for his actions. During August 2019, Adam was refusing to  
23 sign a quitclaim deed so that Chalese could use her share of proceeds from the  
24 marital residence to buy a house. Adam had already moved into a large house  
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1 provided by his father, yet tried to keep Chalese from having a house suitable for  
2 their children.

3           Currently, Adam has obtained a Temporary Protective Order against Josh.  
4 There is no reason to focus on the behavior order at this time when the TPO is  
5 controlling and Josh has no intention of violating either order. Chalese and Josh  
6 ended their relationship in December 2019, during which time Chalese had no  
7 control over his actions. Chalese advised the Court at the last hearing that she  
8 and Josh have resumed their relationship. Chalese has advised Josh and his  
9 family to abide by the behavior order. Adam's allegations that he is being  
10 disparaged on Facebook are mere allegations without any supporting  
11 documentation.  
12

13  
14           Finally, Adam alleges that Chalese has disparaged him to the children.  
15 First, their children are ages four (4) and two (2). At these young ages, it clear  
16 that either parent can manipulate what the children say. Chalese has not told the  
17 children that Adam is mean to her. Adam is not present when Chalese is alone  
18 with the children and he does not know what goes on in her home. However,  
19 Adam presumes to know everything about Chalese and despite the fact that he has  
20 had her followed by a private investigator for almost a year has not uncovered any  
21 illegal activity or crimes. From the videos that Chalese has viewed, produced by  
22 Adam, she is concerned that Adam is coaching Michael to say things. Young  
23 children are unreliable reporters and Chalese believes Adam is coaching the  
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1 children, thus this issue should be addressed by the custody evaluator. Adam  
2 fought hard to eliminate the custody evaluation, likely because he wants the Court  
3 to just take his word as evidence. The fact that Adam would want Chalese held in  
4 contempt for his false allegations shows that he continues to want to control her.  
5 Adam has consistently sought to reduce Chalese's time with the children and will  
6 not stop until he has achieved same.

8         Despite the fact that both parties were ordered to attend UNLV's  
9 Cooperative Parenting Class, only Chalese has provided proof. Adam admitted,  
10 in his deposition that he does not believe Chalese should have more than a few  
11 hours with the children per week. He does not value her as a mother and the  
12 current orders have empowered him to treat her as a non-parent. When Chalese  
13 agreed that the children should attend a less expensive daycare, Adam unilaterally  
14 selected one by his home. Chalese has repeatedly requested that the parties enroll  
15 the children in a daycare that is convenient for both parties, but he has refused.  
16 Further, Adam has authorized his girlfriend to pick up the children from daycare,  
17 but will not allow their mother to do so.

18         There is no cause for Adam to pick up the children from daycare on  
19 Chalese's days other than to cause conflict. Even if Adam leaves his new job by  
20 5:00 p.m. and gets home with the children by 5:45 p.m., this does nothing more  
21 than create an unnecessary transition for their children. The purpose of the  
22 Court's order was to reduce tension and conflict between the parties, especially in  
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1 view of the children. As such, all weekday exchanges should take place at  
2 daycare only. Further, the fact that Adam or his girlfriend can pick up the  
3 children early, but Chalese must wait until 6:00 p.m. makes no sense. The  
4 children are not in school and any time they can spend with a parent, over daycare,  
5 should be permitted.

7 Despite the fact that this case is set for trial at the end of June 2020, Adam  
8 is making yet another attempt to reduce Chalese's time with the children. Adam  
9 has openly waged war against Chalese without any consideration for the  
10 children's best interest. Adam presents previously litigated allegations dating  
11 back to February 2019 for the sole purpose of harassing Chalese, in his attempt to  
12 eliminate her custody before the Court has even heard evidence. Adam's  
13 positions have absolutely nothing to do with the children's best interests. Adam  
14 wants to punish Chalese, even though he is the party who wanted the divorce.  
15 Adam's motion should be denied in its entirety, but if any of Adam's claims are  
16 considered by the Court then those claims should be part of the three (3) day trial  
17 already scheduled in this matter.

19 **B. LEGAL ARGUMENT**

20 ***1. Chalese Should Not Be Ordered to Show Cause.***

22 NRS 22.010 defines contempt as “[d]isobedience or resistance to any lawful  
23 writ, order, rule or process issued by the court or judge at chambers.” For the  
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1 foregoing reasons, Chalese has not committed a contempt and Adam's request for  
2 an order to show cause should be denied.

3  
4 *a. Chalese has not violated the marijuana or alcohol order*

5 Adam claims that Chalese has allowed Josh to smoke marijuana around the  
6 children. Not only is this untrue, but there is no order preventing Josh from  
7 using legal marijuana or alcohol. Chalese should not be prevented from using  
8 legal alcohol or marijuana either but has complied with the Court order.  
9 However, in the event that Chalese used marijuana when she did not have the  
10 children, it would still be detected in a drug test. Chalese will submit that she has  
11 not used marijuana but further testing, for this legal substance, is unnecessary and  
12 will only lead to further harassment from Adam. The Court does not have  
13 jurisdiction over Josh, however, he has not smoked marijuana inside the home  
14 during any time Chalese had custody of the children. As such, it is clear that  
15 Chalese has not violated the order for alcohol or marijuana.  
16  
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18 *b. Josh has not driven the children since the June 17, 2019 Order*

19 Again, Adam will stop at nothing to try to reduce Chalese's time with the  
20 children. Chalese learned her lesson and already faced consequences for  
21 allowing Josh to drive with the children prior to the order. Adam claims that  
22 Josh drove the children on September 14, 2019 and October 31, 2019. Chalese  
23 drove the children on these two occasions. Adam did have a private investigator  
24 follow Chalese on Halloween 2019, but if he truly believed that Chalese was  
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1 letting Josh drive the children, it would make no sense to wait over four (4)  
2 months to file a motion. Adam has not produced any evidence that his claims are  
3 true and if the Court is inclined to entertain his false allegations, this matter should  
4 be presented at trial. Chalese has not violated the June 17, 2019 Order and has  
5 not allowed Josh to drive the children.  
6

7 *c. Behavior Order*

8 Both parties have made allegations that the other has violated the behavior  
9 order. Adam has repeatedly called Chalese a liar in their messages. Further, he  
10 continues to treat her as a non-parent. Adam's request for an Order to show  
11 cause should be denied and any alleged violations of the behavior order should be  
12 deferred to trial. It is clear that Adam is attempting to outspend Chalese with  
13 attorney's fees and force her to use all her borrowed funds before they reach trial.  
14 Chalese has advised family and Josh to abide by the order.  
15  
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17 **II. COUNTERMOTION**

18 *a. Chalese requests that weekday exchanges take place at daycare and that the*  
19 *Court enforce the order for phone contact with the children.*

20  
21 Chalese requests that all weekday custody exchanges take place at daycare, as  
22 this is in the children's best interest. As stated above, Adam had made it  
23 difficult for Chalese to pick up at his home due to failing to let her in the gate for  
24 his neighborhood and prolonging exchanges. In addition, it forces the children to  
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1 go through an extra and unnecessary transition when Adam picks them up from  
2 daycare and Chalese picks them up a short time later. Adam's refusal to agree  
3 that Chalese can pick up from daycare is yet another example of his desire to  
4 control her. The children's needs must be put before Adam's desire to make life  
5 difficult for Chalese. As such, Chalese requests that the Court issue an order for  
6 weekday picks from daycare only, unless the children are sick or daycare is  
7 closed.  
8

9 Adam should be admonished for his failure to abide by the Partial Parenting  
10 Plan for telephone contact. For many months, Chalese has ensured that Adam  
11 gets to speak to the children at 7:00 p.m. when they are with her. Chalese's calls  
12 to the children frequently go unanswered and Adam has not abided by the order.  
13 Chalese requests that the Court enforce the order for phone contact with the  
14 children.  
15

16  
17 *b. Chalese should be Awarded Attorney's fees.*

18 NRS 18.010 allows for an award of attorney's fees when a claim is  
19 "brought or maintained without reasonable ground or to harass" the other party.  
20 Similarly, EDCR 7.60 allows for sanctions in the form of attorney's fees when a  
21 party "[p]resents to the court a motion or an opposition to a motion which is  
22 obviously frivolous, unnecessary or unwarranted." Without cause, Adam has  
23 filed yet another motion and forced Chalese to respond to his false allegations.  
24

25 With specific reference to Family Law matters, the Supreme Court has  
26



1 adopted the “well-known basic elements,” which, in addition to hourly time  
2 schedules kept by the attorney, are to be considered in determining the reasonable  
3 value of an attorney’s service qualities. These are commonly referred to as the  
4 *Brunzell* factors which are set forth in *Brunzell v. Golden Gate National Bank*, 85  
5 Nev. 345, 349, 455 P.2d 31, 33 (1969).  
6

- 7 1. *The Qualities of the Advocate*: Her ability, her training, education,  
8 experience, professional standing and skill. **Undersigned counsel is**  
9 **a respected attorney who has practiced family law in Nevada for**  
10 **15 years.**
- 11 2. *The Character of the Work to Be Done*: Its difficulty, its intricacy, its  
12 importance, time and skill required, and responsibility imposed and  
13 the prominence and character of the parties where they affect the  
14 importance of the litigation. **Undersigned counsel used extreme**  
15 **detail and resources in crafting this Opposition.**
- 16 3. *The Work Actually Performed by the Lawyer*: The skill, time and  
17 attention given to the work. **Much attention and skill was used in**  
18 **creating this document.**
- 19 4. *The Result*: Whether the attorney was successful and what benefits  
20 were derived. **Results are at this point unknown.**

21 Each of these factors should be given consideration, and no one element  
22 should predominate or be given undue weight. *Miller v. Wilfong*, 121 Nev. 119,  
23 P.3d 727 (2005). Additional guidance is provided by reviewing the “attorney’s  
24 fees” cases most often cited in Family Law--Discretionary Awards: Awards of  
25 fees are neither automatic nor compulsory, but within the sound discretion of the  
26 Court, and evidence must support the request. *Fletcher v. Fletcher*, 89 Nev. 540,

1 516 P.2d 103 (1973), *Levy v. Levy*, 96 Nev. 902, 620 P.2d 860 (1980), *Hybarger*  
2 *v. Hybarger*, 103 Nev. 255, 737 P.2d 889 (1987).

3  
4 The *Brunzell* factors require counsel to rather immodestly make a  
5 representation as to the “qualities of the advocate,” the character and difficulty of  
6 the work performed, and the work *actually* performed by the attorney.

7 First, respectfully, vegas west attorneys is an established, reputable A/V-  
8 rated law firm. Counsel from vegas west attorneys has practiced Family Law in  
9 Nevada for 15 years and the supervising counsel for Pecos Law Group has  
10 practiced Family Law in Nevada for over 25 years.

11  
12 As to the “character and quality of the work performed,” counsel’s work in  
13 this matter to have been adequate, both factually and legally; we have diligently  
14 reviewed the applicable law, explored the relevant facts, and believe that counsel  
15 has properly applied one to the other.

16  
17 The fees charged by paralegal staff are reasonable, and compensable, as  
18 well. The tasks performed by staff in this case were precisely that were “some of  
19 the work that the attorney would have to do anyway [performed] at substantially  
20 less cost per hour.” *LVMPD v. Yeghiazarian*, 129 Nev. 312 P.3d 503 (2013),  
21 (Adv. Opn. No. 81, Nov. 7, 2013), citing to *Missouri v. Jenkins*, 491 U.S. 274  
22 (1989).

23  
24 As the Nevada Supreme Court reasoned, “[T]he use of paralegals and other  
25 non-attorney staff reduces litigation costs, so long as they are billed at a lower

1 rate,” so “reasonable attorney’s fees...included charges for persons such as  
2 paralegals and law clerks.”

3 Also in support of Chalese’s fees, she should receive attorney’s fees  
4 pursuant to NRS 18.010, which states as follows:  
5

6 2. In addition to the cases where the allowance is  
7 authorized by specific statute, the court may make an  
8 allowance of attorney’s fees to a prevailing party:

9 . . . .

10 Simply put, Nevada law strongly suggests that Adam should not prevail and  
11 that Chalese will. Adam wants this Court to modify custody again, based upon  
12 the same unproven allegations the Court has already addressed. Further, he  
13 continues to make false accusations against Chalese. Chalese is entitled to her  
14 day in Court and Adam should not be permitted to use any further allegations to  
15 modify her time. Adam should have to present actual evidence, at trial, before  
16 any decisions are made regarding custody of their children.  
17

18 Chalese respectfully requests that she be permitted after the hearing in this  
19 matter to submit an affidavit pursuant to *Miller v. Wilfong* and *Brunzell v. Golden*  
20 *Gate Nat'l Bank* and/or be ordered to comply with NRCP 54(d)(2).  
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22 Therefore, Chalese requests that she be awarded attorney’s fees for having  
23 to defend against the same allegations which have already been presented to the  
24 Court.  
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**III. CONCLUSION**

WHEREFORE, based on the foregoing, Defendant **Chalese Solinger** respectfully requests that this court enter orders granting her the following relief:

1. Denying Plaintiff's MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT;
2. For an Order Confirming that Plaintiff must allow phone contact between the minor children and their mother;
3. For an Order that all weekday custody exchanges will take place at the children's daycare; and
4. Awarding Defendant such other and further relief as this court deems just and proper in the premises.

DATED this 16<sup>th</sup> day of March, 2020.

**vegas west attorneys**

  
**Kristina C. Kirigin, Esq.**

Nevada Bar No. 9082  
5594 South Fort Apache Road, Suite 120  
Las Vegas, Nevada 89148  
Attorney for Defendant

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**DECLARATION OF CHALESE SOLINGER**

I, **Chalese Solinger**, am the Defendant in the above-entitled action and I am signing this declaration under penalty of perjury as if it were a sworn affidavit. I have read the above and foregoing DEFENDANT’S OPPOSITION TO PLAINTIFF’S FOR AN ORDER TO SHOW CAUSE AND TO HOLD DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019 ORDER, AND THE BEHAVIOR ORDER FILED MARCH 19, 2019; FOR ATTORNEY’S FEES AND RELATED RELIEF REGARDING CONTEMPT COUNTERMOTION TO ENFORCE PHONE CONTACT WITH THE MINOR CHILDREN AND FOR ATTORNEY’S FEES and know the contents thereof; and that the same is true of my own knowledge, except as to those matters therein stated on information and belief, and as to those matters, I believe them to be true. Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this 16 day of March, 2020

  
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CHALESE SOLINGER

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CERTIFICATE OF SERVICE


Pursuant to NRCP 5(b), I hereby certify that “DEFENDANT’S OPPOSITION TO PLAINTIFF’S FOR AN ORDER TO SHOW CAUSE AND TO HOLD DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019 ORDER, AND THE BEHAVIOR ORDER FILED MARCH 19, 2019; FOR ATTORNEY’S FEES AND RELATED RELIEF REGARDING CONTEMPT COUNTERMOTION TO ENFORCE PHONE CONTACT WITH THE MINOR CHILDREN AND FOR ATTORNEY’S FEES” in the above-captioned case were served this date as follows:

- pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system;
- by placing the 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;
- pursuant to EDCR 7.26 to be sent via **facsimile**, by duly executed consent for service by electronic means;
- by hand-delivery with signed Receipt of Copy.

To individual(s) listed below at the address:

Vincent Mayo VMGroup@TheAbramsLawFirm.com

DATED this 16<sup>th</sup> day of March, 2020.

  
 \_\_\_\_\_  
**Alex Gomez**  
 an employee of **vegas west attorneys**

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/OPPPOSITION  
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"/> <b>\$25</b>	The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
-OR-	
<input checked="" type="checkbox"/> <b>\$0</b>	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.

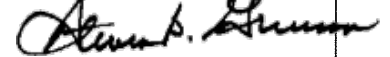
<input checked="" type="checkbox"/> <b>\$0</b>	The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>	The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>	The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
-OR-	
<input type="checkbox"/> <b>\$129</b>	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"/> <b>\$57</b>	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:	
<input checked="" type="checkbox"/> <b>\$0</b>	<input type="checkbox"/> <b>\$25</b> <input type="checkbox"/> <b>\$57</b> <input type="checkbox"/> <b>\$82</b> <input type="checkbox"/> <b>\$129</b> <input type="checkbox"/> <b>\$154</b>

Party filing Motion/Opposition: Defendant Date 3/14/20

Signature of Party or Preparer *Kiara King*



1 **EXHS**  
2 **Kristina C. Kirigin, Esq.**  
3 Nevada Bar No. 9082  
4 **vegas west attorneys**  
5 5594 South Fort Apache Road, Suite 120  
6 Las Vegas, Nevada 89148  
7 Telephone: +1 (702) 629-7553  
8 Facsimile: (702) 629-2276  
9 Email: [kristina@vegaswestattorneys.com](mailto:kristina@vegaswestattorneys.com)  
10 Attorney for Defendant

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

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

18 Case No. **D-19-582245-D**  
19 Dept. No. **I**

20 Date of Hearing: **April 7, 2020**  
21 Time of Hearing: **9:30 a.m.**

22 **EXHIBIT APPENDIX**

23 **TO OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW CAUSE AND TO**  
24 **HOLD DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF THE MARCH 19,**  
25 **2019 ORDER, THE JUNE 17, 2019 ORDER, AND THE BEHAVIOR ORDER FILED MARCH**  
26 **19, 2019; FOR ATTORNEY'S FEES AND COSTS AND RELATED RELIEF AND**  
27 **COUNTERMOTION TO ENFORCE PHONE CONTACT WITH THE MINOR CHILDREN AND**  
28 **FOR ATTORNEY'S FEES**

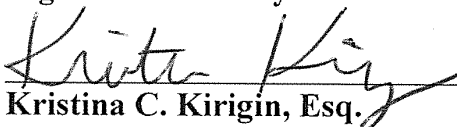
EXHIBIT	DESCRIPTION OF DOCUMENT	BATES STAMP NOS.
A	Appclose messages on 6-23-19;	DEFT000001- DEFT000004;
B	Appclose messages on 8-26-19;	DEFT000005- DEFT000006;



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C	Appclose messages on 10-20-19	DEFT000007- DEFT000008.
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DATED this 16<sup>th</sup> day of March 2020.

**vegas west attorneys**  
  
**Kristina C. Kirigin, Esq.**  
Nevada Bar No. 9082  
5594 South Fort Apache Road, Suite 120  
Las Vegas, Nevada 89148  
Telephone: +1 (702) 629-7553  
Facsimile: (702) 629-2276  
Email: [kristina@vegaswestattorneys.com](mailto:kristina@vegaswestattorneys.com)  
Attorney for Defendant

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCPC 5(b), I certify that I am an employee of VEGAS WEST  
3 ATTORNEYS and that on this 10<sup>th</sup> day of March 2020, I served a copy of the "EXHIBIT  
4 APPENDIX TO OPPOSITION TO PLAINTIFF'S MOTION FOR AN ORDER TO SHOW  
5 CAUSE AND TO HOLD DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF THE  
6 MARCH 19, 2019 ORDER, THE JUNE 17, 2019 ORDER, AND THE BEHAVIOR ORDER  
7 FILED MARCH 19, 2019; FOR ATTORNEY'S FEES AND COSTS AND RELATED RELIEF  
8 AND COUNTERMOTION TO ENFORCE PHONE CONTACT WITH THE MINOR CHILDREN  
9 AND FOR ATTORNEY'S FEES" as follows:

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13 [ X ] pursuant to NEFCR 9, by mandatory electronic service through the  
14 Eighth Judicial District Court's electronic filing system;
- 15 [ ] by placing the same to be deposited for mailing in the United  
16 States Mail, in a sealed envelope upon which first class postage was  
17 prepaid in Las Vegas, Nevada;
- 18 [ ] pursuant to EDCR 7.26 to be sent via facsimile, by duly executed  
19 consent for service by electronic means;
- 20 [ ] by hand-delivery with signed Receipt of Copy.

21 To individual(s) listed below at the address:

22 Vincent Mayo VMGroup@TheAbramsLawFirm.com

23 DATED this 10<sup>th</sup> day of March 2020.

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27 Alex Gomez  
28 an employee of vegas west attorneys


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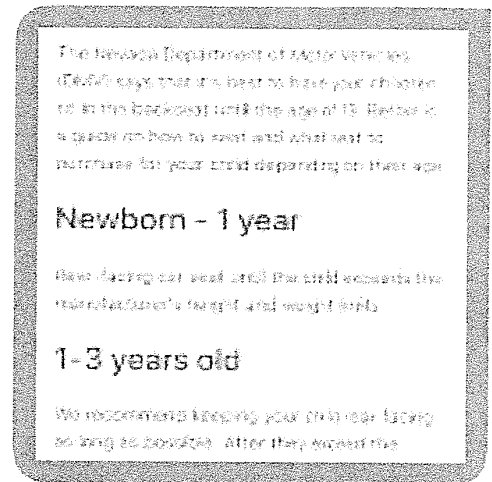
# EXHIBIT A


# EXHIBIT A

5:58 PM

Please keep her rear facing. She's still too small and too young to face forward.

6:04 PM 



6:04 PM 

Her car seat says 22 pounds and her seat was as reclined as possible for rear facing. Her legs were crumpled up and she was getting too hot. Just like we did with Maq, I switched her to forward facing for heat management and so she had legroom. Even the picture you posted says that it's recommended but to

DEFT000001


001883

6:22 PM

Please turn her around until she's two. Then you can turn her around. Just like we did with Maq, after their second birthday

6:22 PM 

I'm not asking much. It's to keep her safe. You can cool her car seat with ice packs before she gets in.

6:24 PM 

Don't worry. I will always have my children's best interest and safety in mind.

6:26 PM

If that was true she'd still be rear facing. It's just as important as proper placement of the chest clip. You know I have done extensive research on car

DEFT000002

001884


I'm debating this. I'm going by the instructions for her specific car seat.

6:38 PM

I'm not\*

6:39 PM

Then turn her around and there won't be any debating. This isn't based on my opinion. These are facts. It is safer for Marie, especially since she's under the average size

6:44 PM 

That's your preference. The actual safety label literally says death or substantial bodily harm will result if she's too big and is rear facing.

8:15 PM

She's not too big. She is the minimum. DEFT000003

001885


I'm debating this. I'm going by the instructions for her specific car seat.

6:38 PM

I'm not\*

6:39 PM

Then turn her around and there won't be any debating. This isn't based on my opinion. These are facts. It is safer for Marie, especially since she's under the average size

6:44 PM 

That's your preference. The actual safety label literally says death or substantial bodily harm will result if she's too big and is rear facing.

8:15 PM

She's not too big. She is the minimum DEFT000004

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# EXHIBIT B

# EXHIBIT B




MON, AUG 26

I'd like to talk to my kids


7:34 PM 

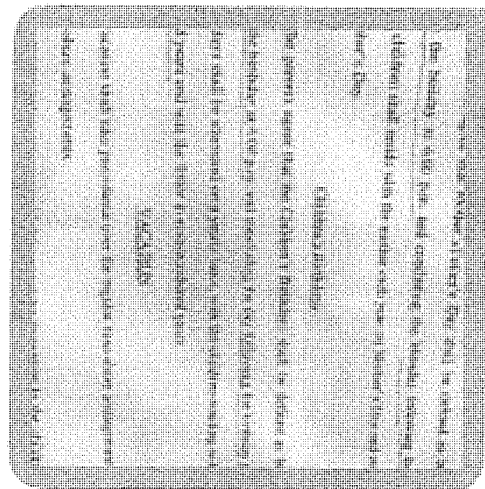
And not get hung up on

7:34 PM 

TUE, AUG 27

I will be picking up Marie at 4pm as it is stated in the parenting agreement for her birthday

10:57 AM 



10:58 AM 

DEFT000005

001888

Marie will be at home so you can get her from there. Just a reminder I have right of first refusal so if you intend on having someone else watch her while you work please advise me immediately so I may make the proper arrangements.

There is no need for you to have Jessica's parents address and phone number being that they do not watch the kids. I will allow you to have Courtney's number (702-498-0626) but please refrain from calling her a cunt, spawn or any other names you feel are necessary to call a 16 year old.


Finally, please talk to Linda Overbey and inform her to stop calling my job being that this is your mother in law?

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# EXHIBIT C


# EXHIBIT C

Can I call the kids early tonight?

4:30 PM 

SUN, OCT 20

When can I talk to my kids?

7:00 PM 

Chalese. I don't understand the six attempts at calling and your message. We were sitting down having a nice dinner. When have the kids ever failed to call back? Six calls was extremely excessive. The kids have always called you back if they were busy with dinner or bath.

8:39 PM

The order says 7:00 not whenever Adam feels like it.

9:00 PM  DEFT000007


001891

WED, OCT 23

FYI. Maq is still eating dinner and Marie went to be early for throwing a fit at dinner. I will have him FaceTime when he is done with bath.

7:33 PM

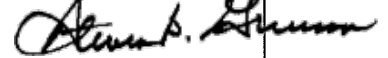
So you couldn't have the courtesy to let her call before bed? I make sure you speak to them every time they're with me I would appreciate the same.

7:35 PM 

She was throwing a fit and screaming and would not calm down because she didn't want the food on her plate. What she needed was to go to bed and start fresh in the morning. As always, you are more than welcome to call in the morning to make up for the time

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


Eighth Judicial District Court  
Family Division  
Clark County, Nevada

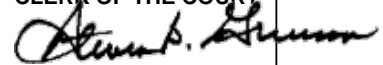
ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
Plaintiff,	)	Department: I
vs.	)	
	)	
CHALESE MARIE SOLINGER,	)	
	)	
Defendant.	)	
	)	
	)	

**RECEIPT OF CHECK**

I hereby acknowledge receipt of check number 8012, in the amount of \$3,750.00 made payable to Dr. Paglini, as and for Plaintiff's one-half of the retainer payment.

Dated this 19 day of March, 2020.

  
\_\_\_\_\_  
Dr. Paglini / An employee of Dr. Paglini



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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

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

13 **NOTICE OF UNLV COOPERATIVE PARENTING PROGRAM**  
14 **COMPLETION**

15 PLEASE TAKE NOTICE that Plaintiff, ADAM MICHAEL  
16 SOLINGER (hereinafter referred to as “Adam”), has successfully  
17 completed the UNLV Cooperative Parenting Program.

18 ///

19 ///

20 ///

21 ///

1 A true and correct copy of Adam's Letter of Completion is attached  
2 hereto.

3 DATED Wednesday, March 25, 2020.

4 Respectfully Submitted,

5 THE ABRAMS & MAYO LAW FIRM

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

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that the foregoing NOTICE OF UNLV  
12 COOPERATIVE PARENTING PROGRAM was filed electronically with  
13 the Eighth Judicial District Court in the above-entitled matter on  
14 Wednesday, March 25, 2020. Electronic service of the foregoing  
15 document shall be made in accordance with the Master Service List,  
16 pursuant to NEFCR 9, as follows:

17 Kristina C. Kirigin, Esq.  
18 Attorney for Defendant

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

21



November 26, 2019

Judge Cheryl Moss  
Family Court Division, Department I  
Family Courthouse  
601 N. Pecos  
Las Vegas, Nevada 89155

Re: Adam Michael Solinger  
Adam Michael Solinger, Plaintiff  
vs. Chalese Marie Solinger, Defendant  
Case No. D-19-582245-D

Dear Judge Moss,

This letter is to confirm that the following individual has completed the UNLV Cooperative Parenting Program, offered through the UNLV Division of Educational Outreach:

*Adam Michael Solinger*

Please do not hesitate to contact me if you need additional information. Thank you for your referral to this program.

Sincerely,

*Kathleen Bergquist*

Kathleen Ja Sook Bergquist, LCSW, JD, Ph.D.  
Program Facilitator  
(702) 895-2449  
kathleen.bergquist@unlv.edu