

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

**\* \* \***

ADAM MICHAEL SOLINGER,

Appellant,

vs.

CHALESE MARIE SOLINGER,

Respondent.

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Case No.: 84832-COA

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**APPELLANT'S APPENDIX  
VOLUME 9**

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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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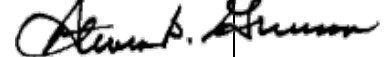
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**ROPP**

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Eighth Judicial District Court  
Family Division  
Clark County, Nevada

ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
Plaintiff,	)	Department: I
vs.	)	
	)	
CHALESE MARIE SOLINGER,	)	Date of Hearing: April 7, 2020
	)	Time of Hearing: 9:30 a.m.
Defendant.	)	
	)	

**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**

NOW INTO COURT comes Plaintiff, ADAM MICHAEL SOLINGER,  
by and through his attorney, Vincent Mayo, Esq., of The Abrams & Mayo  
Law Firm, and hereby submits his *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*

1 *ORDER, THE JUNE 17, 2019 ORDER, AND THE BEHAVIOR ORDER*  
2 *FILED MARCH 19, 2019; FOR ATTORNEY'S FEES AND COSTS AND*  
3 *RELATED RELIEF AND PARTIAL OPPOSITION TO*  
4 *COUNTERMOTION TO ENFORCE PHONE CONTACT WITH THE*  
5 *MINOR CHILDREN AND FOR ATTORNEY'S FEES.*

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

9 Dated Monday, March 30, 2020.

10 Respectfully Submitted,

11 THE ABRAMS & MAYO LAW FIRM

12 /s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

13 Nevada State Bar Number: 8564

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Attorney for Plaintiff

15 **MEMORANDUM OF POINTS AND AUTHORITIES**

16 **I. REPLY**

17 Adam's motion has an important function: It seeks to protect the  
18 parties' children from Chalese's continuous terrible judgment, selfishness  
19 and reckless disregard. Evidently, the children's security and welfare are  
20 not enough of a reason for Chalese to follow this Court's orders, leaving  
21

1 Adam no option but to pursue this motion. Again, if Chalese would simply  
2 follow this Court's orders, this motion would not be necessary.

3 **Chalese's Withholding of the Minor Children**

4 Adam only seeks to hold Chalese in violation of the Court's orders  
5 that occurred after the June 17, 2019 hearing, during which the Court  
6 changed custody. One of those times was on August 2, 2019, when Chalese  
7 admits that she picked the children up early in violation of Adam's time.  
8 Chalese's claim that she could pick the children up early is undermined by  
9 the fact she had previously asked to have the children early during Adam's  
10 time, something Adam refused.

11 The reason this issue is still relevant is that Adam will get off of work  
12 early and pick the children up on his day to enjoy time with them.  
13 Chalese's wish to have the children during Adam's time obviously denies  
14 him of this time.

15 Chalese complains that she sometimes has to pick the children up  
16 from Adam's home when Adam picks the children up early from school  
17 but Adam's home is just over a mile from the school, meaning Chalese  
18 does not have to drive much farther. However, when Chalese comes to  
19 Adam's neighborhood to pick up the children, he lets her in quickly when  
20 Chalese lets Adam know she is on her way there.

21 ///

1       It must be remembered that early on in this litigation, Adam stated  
2 he was willing to come to an agreement as to a school for the children and  
3 offered the present one based on its academics, facilities, teachers and  
4 location. Chalese stated in Court on March 19<sup>th</sup> that she was fine with  
5 whichever school Adam chose; that agreement is reflected in the March  
6 19<sup>th</sup> order.

7       Adam has not withheld custody from Chalese except for one time,  
8 when Chalese had admitted she wanted the children to drive them to  
9 Idaho, even though she stated she was taking a drug that barred her from  
10 driving. This Court held that Adam, after first attempting to resolve the  
11 situation via counsel and an ex parte motion, acted prudently in  
12 withholding the children.

### 13       **Josh Threatening Adam**

14       The Court found at the February 26, 2020 hearing that Josh had  
15 physically threatened Adam and that Josh's behavior reflected badly on  
16 Chalese. This is relevant since the behavior order filed on March 27, 2019  
17 states the parties are to keep their significant other's from harassing the  
18 other party. Hence, the Behavior Order is intended to make Chalese  
19 accountable for Josh's conduct as a significant other—and in fact pseudo-  
20 husband—as such, Josh's exposure to the children is completely within  
21 Chalese's control. Worse, and despite Chalese knowing her pseudo-

1 husband has a criminal past, a drug addiction and propensity towards  
2 violent crime, she remains with him.

3 As for Chalese's claim that Adam was not entitled to have the  
4 children on December 7, 2019, this is not true. Under the terms of the  
5 parties' holiday and vacation plan, either can request vacation time during  
6 the other's regular timeshare. On September 13, 2019, Adam sent Chalese  
7 an AppClose message stating he was exercising his right to have the  
8 children on December 7, 2019 for some of his vacation time.<sup>1</sup> Chalese was  
9 not opposed to this. However, when Adam reminded Chalese on  
10 December 6<sup>th</sup>, Chalese suddenly protested, stating she had "plans for that  
11 day"<sup>2</sup> even though she knew for three months December 7<sup>th</sup> was Adam's  
12 time. Hence, Adam was entitled to be at Chalese's home on December 7<sup>th</sup>  
13 to pick up the children. As for confusion over Christmas Eve and  
14 Christmas Day, there was none – Chalese simply ignored the parties' prior  
15 agreement (which was confirmed in writing). Regardless, Adam's  
16 December 7<sup>th</sup> time with the children and Christmas Eve / Day time are  
17 two separate events and addressed separately by the parties.

18 ///

19 ///

---

20  
21 <sup>1</sup> See **Exhibit 13**.

<sup>2</sup> See the December 6<sup>th</sup> and December 7<sup>th</sup> AppClose messages between the parties,  
attached as **Exhibit 14**.

1           **Adam Cooperates with Chalese as to Phone Calls**

2           Adam was in fact the one who first requested to have set times for  
3 calls with the children. Adam adheres to the agreed upon time as much as  
4 possible, which is a vast majority of the time. However, there have been  
5 times, due to the young children falling asleep early or eating dinner late,  
6 that they have not been available or could not speak right away. However,  
7 this has only been a handful of times and each time, Adam offered to make  
8 up the calls as soon after as possible. Further, these delays sometimes  
9 occurred when Adam was with Michael at his speech therapy sessions.  
10 Surely Chalese cannot hold this against Adam. Chalese knows these few  
11 times were the exception, which is why she did not bring a motion to hold  
12 Adam in contempt. If anyone has violated this provision, it is Chalese,  
13 who will flat out refuse Adam's facetime calls with the children without  
14 explanation as to why.

15           **Chalese's Marijuana Addiction**

16           Chalese can play dumb as to her addiction but the facts speak for  
17 themselves:

- 18           • Chalese stated at the March 26, 2019 hearing that she had not  
19           used marijuana for a long time but then tested positive later the  
20           same day.

21        ///

- 1 • Chalese stated at the March 26, 2019 hearing that she would not  
2 use marijuana anymore (which was made an order during the  
3 March 26<sup>th</sup> hearing) but then tested positive three months later,  
4 on June 19, 2019.
- 5 • Chalese states Josh smokes around her and the children,  
6 something she apparently has no issue with.
- 7 • At times, Chalese's statements to Adam are incoherent and  
8 nonsensical (as if she were under the influence of drugs).
- 9 • Adam notified Chalese via text on August 7, 2019 that she needed  
10 to go in for drug testing but Chalese refused, not doing so until  
11 the next day. Chalese claims it was because the drug testing  
12 facility was only open until 5:00 p.m. and ignores the fact that  
13 there was another facility that was open after 5:00 p.m.
- 14 • Adam next requested Chalese to go in for drug testing on  
15 September 4, 2019. Instead of going in right away, Chalese was  
16 caught by Adam's PI buying several products, including a drug  
17 detox kit, from a smoke shop and going home to use them prior  
18 to showing up for testing **just** before the deadline to test. Chalese  
19 later admitted to this during her deposition.
- 20 Chalese, having been caught in numerous lies, now tries to get out  
21 of the Court's order by claiming she is entitled to use marijuana for



1 “medical purposes.” However, if Chalese had a legitimate medical reason  
2 to use marijuana (which she doesn’t and never has), she would not have  
3 stated she did not use it at the March 19<sup>th</sup> hearing nor agreed at the same  
4 time to not use marijuana going forward. Further, Chalese tried to get on  
5 the medical marijuana registry to get a medical marijuana card just three  
6 days after the March 19, 2019 hearing.<sup>3</sup> The timing of Chalese’s  
7 application for a medical marijuana card makes it obvious Chalese had no  
8 medical issue requiring her using marijuana in any circumstance. Rather,  
9 it was a case of Chalese going back on her word after the hearing and  
10 trying to find a way around the Court’s order. The same applies to  
11 Chalese’s continued use of alcohol when she has the children, something  
12 the Court also barred Chalese from using.

13 Chalese’s claim that she should not be required to test for a “legal  
14 substance” ignores the fact that it is not the legality of a substance, but a  
15 person’s proclivity to abuse it, as well as the affects it has on their  
16 parenting ability, that need to be considered. This is often seen in cases  
17 involving alcohol. Further, marijuana can be addictive.<sup>4</sup> While not the  
18 norm, the National Institute on Drug Abuse released data that people can  
19 develop “marijuana use disorder,” especially with people with underlying

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20 <sup>3</sup> See the high-lighted portion of Chalese’s Capital One credit card statement dated  
21 March 26, 2019, attached as **Exhibit 15**.

<sup>4</sup> <https://www.drugabuse.gov/drugs-abuse/marijuana>.

1 mental illness such as depression, anxiety, and post-traumatic stress,  
2 etc.—**all** conditions which Chalese claims she has, but supposedly takes  
3 other medications for.

4 Living with someone who continues to use marijuana (and therefore  
5 is an enabler), such as Josh, simply makes things worse. Chalese claims  
6 Josh does not use marijuana around her or the children but the deposition  
7 of the mother of Josh's daughter, Josh's statements during his TRO  
8 hearing, Adam and Jessica personally witnessing Josh using marijuana  
9 while the children are with Chalese (and photos of same), all evidence this  
10 is a lie by Chalese.

11 Chalese claims that Josh did not have an opportunity during the  
12 TRO hearing to deny his using marijuana around the children, but this is  
13 another blatant lie. A review of the transcript from the January 8, 2020  
14 TRO hearing shows that after Adam told the Judge Amy Chelini that Josh  
15 was smoking and drinking on the day in question, when Chalese had the  
16 children, the Judge stated:

17 THE COURT: Okay. Sir [to Josh], I appreciate you not interrupting,  
18 and that's kind of like how we like to do things. Now it's your turn.  
19 Go ahead, Mr. Lloyd, and tell me what's going on or what's your  
20 response?<sup>5</sup>

21 ///

///

---

<sup>5</sup> Page 8 of the January 8, 2020 hearing transcript.

1       **Chalese's Continued Violation of the June 17, 2019 Order**  
2       **that Bars Josh from Driving the Minor Children**

3       The Court barred Josh from driving the parties' minor children with  
4 no exceptions.<sup>6</sup> Despite this, Chalese tries to conjure up excuses, such as  
5 Adam having Chalese followed by a PI caused her "anxiety", resulting in  
6 her taking a medication that barred her from driving. If a parent is  
7 following court orders and not being reckless in their care of the children,  
8 they have no reason to fear a PI.

9       Chalese has tens of thousands of dollars for this litigation and  
10 therefore could have placed a PI on Adam; despite this, Adam suffers no  
11 anxiety from this possibility as he knows he is following the Court's orders  
12 and is acting in the children's best interests. Meanwhile, Chalese is  
13 observed letting Josh drive the minor children, buying and using a drug  
14 detox after being requested to drug test, endangering the children by  
15 speeding in excess of 100 miles per hour, weaving in and out of traffic and  
16 using her cell phone, all while the children were in her truck with her.  
17

18 \_\_\_\_\_  
19 <sup>6</sup> The Court had good reason to forbid this, which included Josh's terrible driving  
20 record and his propensity to abuse marijuana. It now appears that Josh continues to  
21 drive while under the influence of marijuana. During her deposition, Carmen Divasio-  
Watson, the mother of Ariel, Josh's youngest child, testified that in November 2019  
she witnessed Josh having a large container of marijuana, a loaded marijuana pipe  
and a lighter in the center consol of his truck during the exchange of their child. Photos  
of the marijuana, pipe and lighter in the front consol were disclosed to Chalese.

1 As for Chalese's claim that Josh has not driven the children since the  
2 June 17<sup>th</sup> hearing, this is just another lie by Chalese. Adam's PI, Elite  
3 Investigations, observed Josh driving the children several times, namely  
4 on September 6, 2019, September 14, 2019 and October 31, 2019.<sup>7</sup> Chalese  
5 cannot claim she did not know this was occurring as Chalese was observed  
6 sitting in the passenger seat both times.

7 **Chalese's Violations of the Behavior Order**

8 Chalese claims she is doing everything she can to abide by the  
9 behavior order but it is clear "everything she can" actually means nothing.  
10 She admits:

- 11 • That she knew Josh was making negative posts on Adam's former  
12 employer's website and that Josh stated he would take them  
13 down if Adam left him out of the litigation;
- 14 • That Josh's stepmother tried to get Adam fired over him not  
15 signing off on a quitclaim deed (that Adam had no obligation to  
16 do but simply stated that he wanted an order stating he was not  
17 waiving any interest in any new residence paid for by community  
18 funds);
- 19 • Josh disparages Adam on Facebook; and

21  

---

<sup>7</sup> See the relevant portion of the November 18, 2019 PI report, attached as **Exhibit 16**.

- 1       • That she regularly curses at Adam and insults both him and his  
2       significant other, as well as her minor child Courtney.

3       Hence, Chalese has NO CONTROL and no desire to control those in  
4       violation of the behavior order.

5       As for the minor children, Adam has not coached them and their  
6       statements, especially Michael's, are their own. If anyone is acting in an  
7       unacceptable manner, it is Chalese. She is the one who in fact posted on  
8       Facebook a mock child interview she conducted with the children, as  
9       Exhibit 10 to Adam's February 24, 2020 Supplemental Appendix of  
10      Exhibits shows.

11      In summary, the Court can see that Chalese's attempt to play the  
12      victim is just a charade. She is the one who consistently shows terrible  
13      judgment, bad behavior and recklessly endangers the parties' minor  
14      children. The Court's orders were intended to prevent this and since  
15      Chalese is the one violating them, finding Chalese in contempt is wholly  
16      appropriate and necessary, especially since Chalese's violation of the  
17      Court's orders were knowingly and purposely.

18      ///

19      ///

20      ///

21      ///

1 **II. OPPOSITION**

2 **A. Child Exchanges, Jessica's Presence and Phone**  
3 **Contact**

4 The Court recently ordered at the February 26<sup>th</sup> hearing that child  
5 exchanges shall continue as previously ordered in regard to the exchange  
6 locations. This was due in large part to wanting to avert the additional  
7 stress to the young children by designating new locations for exchanges,  
8 and the Courts understanding that Adam wished to be present during the  
9 exchanges, to monitor Chalese's behavior as she is often hostile towards  
10 the daycare staff in front of the children. Additionally, Chalese's present  
11 reasons to change the location are not valid. Chalese has presented **no**  
12 **evidence** that she is forced to wait at the community gate for any  
13 unreasonable period of time, despite her claims that she has video  
14 evidence. Chalese's problem is that she often refuses to use the call box,  
15 instead choosing to wait for another vehicle to enter in an attempt to  
16 piggy-back entering the neighborhood. Chalese's claim that the call box  
17 does not work is just a fabricated excuse in an attempt to change the  
18 exchange location. In fact, Chalese has made this excuse before so one  
19 day, after Chalese stated the call box did not work, Adam went out to try  
20 it and sure enough, the call box worked perfectly fine. In fact, the only

1 person to have come to Adam's house who has claimed the call box did  
2 not work, is Chalese.

3 In light of this, Adam believes Chalese's present request is made out  
4 of anger, in retaliation to Adam seeking to hold her in contempt. If  
5 Chalese's request had been legitimate, she would have made it a few  
6 months ago. Adam would point out that the only individuals who have  
7 behaved inappropriately during exchanges are Chalese and Josh. They are  
8 the ones video show snatching the children from Adam, yelling, casting  
9 aspersions at he and Jessica and threatening physical violence. There is  
10 no reason for **everyone**, including the children, to keep making changes  
11 when the only people misbehaving are Chalese and Josh.<sup>8</sup> Chalese and  
12 Josh misbehave the worst at her residence accordingly, it may be  
13 advisable to have the drop offs on Sundays take place at Adam's home  
14 instead of Chalese's.

15 There is also no reason for Jessica not to be present for exchanges.  
16 Chalese's sole excuse as to why Jessica should not be present is her vague  
17 claim that Jessica misbehaves during exchanges. When challenged on this  
18

---

19 <sup>8</sup> For example, on February 19, 2020, after Adam gave Marie a goodbye kiss, Chalese  
20 literally snatched Marie up so hard she nearly gave her whiplash. Adams has a video  
21 of this that shows Marie's body flailing back from the force. When Adam tried to speak  
to Chalese about this, she simply dismissed it, stating, "You are so wrong, it is  
hilarious."

1 allegation, Chalese stated at the February 26<sup>th</sup> hearing that she had video  
2 of this. However, as is the case with all other evidence Chalese has claimed  
3 to have, Chalese has failed to disclose it. Hence, it is clear Chalese is not  
4 being truthful and in fact has no such videos (just like her claim regarding  
5 child porn on Adam's devices was also a lie). Likewise, there are no "long  
6 goodbyes" as Chalese fabricates, almost all exchanges take around 30  
7 seconds and Chalese cannot produce videos showing supposed elongated  
8 exchanges. It is notable that the children themselves asked for Jessica to  
9 be present during exchanges and at Adam's first solo pick up after the  
10 February 26<sup>th</sup> hearing, the first question Marie and Michael asked was  
11 where Jessica was and then wanted to know why she was not there.

12 Adam also wants Jessica and/or her older daughter present as  
13 Adam wants someone to record exchanges in the event Chalese  
14 misbehaves, as was the case on February 19<sup>th</sup> and when Josh tried to  
15 attack Adam on December 7<sup>th</sup>. Adam is entitled to be secure during  
16 exchanges and make sure they go well for the children.

17 Therefore, Chalese's insistence that Jessica not be present is simply  
18 about her not liking Jessica and has nothing to do with the children.  
19 Chalese wants to "strike back" at Adam, so she tries to exclude Jessica. As  
20 set forth in the attached exhibit (**Exhibit 17**), the first time Chalese asked  
21 that Jessica not be present during exchanges was on February 5, 2020.



1 Specifically, Chalese stated, "And please keep exchanges between us. Your  
2 girlfriend has no business in this." When Adam responded that Jessica  
3 never causes any issues and that the kids like to say goodbye to her and  
4 always ask her to come outside to hold their hands, Chalese did not  
5 contest what Adam said. Instead, she responded with, "I have a problem  
6 with her." When Adam responded in more detail asking for an  
7 explanation and how the Children would take this sudden and uncalled  
8 for change, Chalese responded with, "It's not a hard thing to explain that  
9 daddy takes you outside to mommy. I have a problem with her, her  
10 daughter, and you."

11 As for the children's thoughts on the current exchange locations,  
12 neither has complained about Chalese picking them up from Adam's  
13 home after Adam first picks them up from school. This is actually better  
14 for the children as Adam can give them a snack, go through Michael's  
15 speech therapy exercises (as Chalese has admitted she does not follow the  
16 assigned exercises), bath the children and prepare any clothes or items  
17 that need to be transported, as the four-and two-year old's are too young  
18 to be responsible for transporting these items on their own. Moreover,  
19 exchanges are, in part, on Sundays when there is no school, making  
20 exchanging at the school with the assistance of school officials impossible.

21

1 Therefore, there is not a basis upon which to change the Court's order in  
2 regard to exchange locations.

3       Regarding the audio-visual / phone contact, Adam agrees the  
4 contact should continue. However, both parties must be a little flexible  
5 when dealing with the schedules of four-and two-year old's. For example,  
6 in the one AppClose example Chalese gives, Adam states Michael was still  
7 eating dinner and Marie was put to bed early due to her having a tantrum  
8 at dinner. Adam does state that he will have Michael Facetime Chalese as  
9 soon as he is done. This is perfectly reasonable behavior on Adam's part  
10 and shows his willingness to work with Chalese. Adam would note that  
11 there are times Chalese does not make the children immediately available  
12 to speak, resulting in Adam having to call back, other times, Chalese  
13 simply refuses Facetime with no explanation.

14       Chalese notably does not mention that she will at times, call early  
15 and have the gall to become upset if the children are still eating. Chalese  
16 is also not truthful when she states the children want to Facetime for 5  
17 minutes or more. The children, being so young, are slow to want to  
18 Facetime at all. They are often ready to get off after just two to three  
19 minutes unless there is something to keep their interest. This happens  
20 with both parents but Chalese displays poor judgement when she gets  
21 mad at the children for it, stating, "Don't get off, talk to mommy," "Don't

1 hang up, you need to talk to mommy,” and “Why don’t you want to talk to  
2 mommy?” Chalese should not put the children in an uncomfortable  
3 position and guilt trip them into talking to her longer than they want.

4 **B. Chalese is Not Entitled to Attorney’s Fees**

5 Chalese is the party who continuously and intentionally violates this  
6 Court’s orders, thereby jeopardizing the safety of the children in the  
7 process and preventing her and Adam from co-parenting together. It is  
8 Chalese’s relentless conduct that has driven Adam to file this motion and  
9 seek the help of the Court yet, Chalese has the audacity to request fees  
10 from Adam. Chalese is ***clearly*** in violation of several court orders and  
11 her countermotion is baseless. Therefore, Chalese’s request for fees  
12 should be denied.

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1 **III. CONCLUSION**

2 Based upon the foregoing, Adam respectfully requests that this  
3 Honorable Court grant the relief requested in this Motion, as well as any  
4 further relief the Court deems proper and just, and deny the relief  
5 requested in Chalese's counter-motion.

6 Dated Monday, March 30, 2020.

7 Respectfully Submitted:

8 THE ABRAMS & MAYO LAW FIRM

9 /s/ Vincent Mayo, Esq.

10 Vincent Mayo, Esq.

11 Nevada State Bar Number: 8564

12 6252 South Rainbow Blvd., Suite 100

13 Las Vegas, Nevada 89118

14 Attorney for Plaintiff

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1                   **DECLARATION OF ADAM MICHAEL SOLINGER**

2           I, ADAM MICHAEL SOLINGER, provide this Declaration pursuant  
3 to NRS 53.045 and states the following:

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

7           2.     I make this affidavit in support of the foregoing *REPLY IN*  
8 *SUPPORT OF MOTION FOR AN ORDER TO SHOW CAUSE AND TO*  
9 *HOLD DEFENDANT IN CONTEMPT OF COURT FOR VIOLATION OF*  
10 *THE MARCH 19, 2019 ORDER, THE JUNE 17, 2019 ORDER, AND THE*  
11 *BEHAVIOR ORDER FILED MARCH 19, 2019; FOR ATTORNEY'S FEES*  
12 *AND COSTS AND RELATED RELIEF AND PARTIAL OPPOSITION TO*  
13 *COUNTERMOTION TO ENFORCE PHONE CONTACT WITH THE*  
14 *MINOR CHILDREN AND FOR ATTORNEY'S FEES.*

15          3.     I have read said *Reply and Opposition* and hereby certify that  
16 the facts set forth in the Points and Authorities attached thereto are true  
17 of my own knowledge, except for those matters therein contained stated  
18 upon information and belief, and as to those matters, I believe them to be  
19 true.

20    ///

21    ///

1           4.     I declare under the penalty of perjury pursuant to the laws of  
2 the State of Nevada that the foregoing is true and correct.

3 Dated this 30th day of March 2020.

A handwritten signature in black ink, appearing to read 'Adam Michael Solinger', is written over a horizontal line. The signature is stylized with a large initial 'A' and 'S'.

ADAM MICHAEL SOLINGER

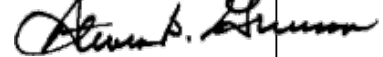
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *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* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Monday, March 30, 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

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



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  
Family Division  
7 Clark County, Nevada

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

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

///

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Exhibit	Description
13	AppClose message from Adam dated September 13, 2019 showing Adam noticing vacation time with the children for December 7, 2019
14	AppClose messages dated December 6 <sup>th</sup> and 7 <sup>th</sup> wherein Chalese states she has “plans for the day”
15	Chalese’s Capital One credit card statement showing her charges on March 26, 2019
16	Relevant portion of the PI report dated November 18, 2019 regarding Josh driving the children on October 31, 2019
17	Message exchanges between parties regarding pickups

Dated Monday, March 30, 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 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* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Monday, March 30, 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 13**

**EXHIBIT 13**

**EXHIBIT 13**

7:31



api2.appclose.com

AppClose Complete Record of Text Communication  
 Period: 6/1/2019 12:00AM to 12/31/2019 11:59PM  
 Requesting Party: Adam Solinger, signed up on 3/20/2019 2:11PM  
 Responding Party/Parties: Chalese Anderson, signed up on 3/22/2019 4:04PM,  
 Adam Solinger, signed up on 3/20/2019 2:11PM



AppClose®

you. It's about what's best for the kids and what they needed was sleep. You can call in the morning if you want to make up for not talking to them tonight.

9/13/2019

*Adam Solinger on 9/13/2019 10:25AM said:*

In the interest of working with you, I'm willing to waive the vacation notice period under the parenting agreement so that you can take 3 vacation days this week and take the kids to see your grandmother. Please let me know as soon as possible if you are going to take the kids to Idaho this week. We have plans this weekend and will not be able to get the kids from daycare this afternoon. Finally, I'm letting you know that I am going to take vacation days with the kids on the following days. October 11 through my normal time resuming October 13. On Saturday December 7th, after their nap or around 3 pm, through until my time normally and Saturday December 21, after their nap or around 3 pm, through until my time. I'd also want to see if you're willing to swap Christmas Eve for Christmas Day because Jessica's family celebrates Christmas on Christmas Eve. Jessica's nephew will be in town the week before Christmas. They always do activities like the polar express and Santa's workshop that week before Christmas. So, please don't make plans with the kids to leave town because Maq loves hanging out with him and he doesn't get to see them often. For the Sundays that I normally have them during December, they're considered holidays and a family

Generated through AppClose Report Generator By: Adam Solinger on 12/6/2019 at 7:28PM Page 213 of 413

AppClose Complete Record of Text Communication  
 Period: 6/1/2019 12:00AM to 12/31/2019 11:59PM  
 Requesting Party: Adam Solinger, signed up on 3/20/2019 2:11PM  
 Responding Party/Parties: Chalese Anderson, signed up on 3/22/2019 4:04PM,  
 Adam Solinger, signed up on 3/20/2019 2:11PM



AppClose®

tradition for German families. So we're all together have special dinner and celebrating.

*Chalese Anderson on 9/13/2019 10:41AM said:*

I have to wait until I get paid to go up to Idaho but I'll let you know as we can get them up there. I am willing to work with

Done Q december

1 of 3



001923

**EXHIBIT 14**

**EXHIBIT 14**

**EXHIBIT 14**



## Conversations

**12/6/2019**

**Chalese Anderson** on 12/6/2019 4:42PM said:

Can I pick them up before six?

**Adam Solinger** on 12/6/2019 4:46PM said:

No, we're decorating the tree.

**Chalese Anderson** on 12/6/2019 4:48PM said:

So let me get this straight, it's ok for you to spend time with them and get them early but it's not ok for me?

**Chalese Anderson** on 12/6/2019 4:48PM said:

Great coparenting 🙏

**Adam Solinger** on 12/6/2019 4:53PM said:

It's my time until 6

**Chalese Anderson** on 12/6/2019 4:55PM said:

🙏

**Chalese Anderson** on 12/6/2019 4:56PM said:

We will follow the court schedule for Xmas btw



**Adam Solinger** on 12/6/2019 4:59PM said:

Just because I won't let you pick up the kids early? So everyone suffers because you're mad. That's very sad for the kids.

**Chalese Anderson** on 12/6/2019 5:06PM said:

No. I've finalized my plans

**Chalese Anderson** on 12/6/2019 5:06PM said:

And they don't involve catering to you and your hateful family

**Adam Solinger** on 12/6/2019 5:10PM said:

It's just oddly suspicious that you suddenly have clarity on your plans right when I reiterate that I want my full time with the kids. It's not catering, it's dividing the holiday in a way that makes sense based upon when each of our families celebrate.

**Chalese Anderson** on 12/6/2019 5:11PM said:

I don't care about your family. It does t matter my reasons. I've made my decision

**Adam Solinger** on 12/6/2019 5:13PM said:

Keep in mind, the kids are part of my family too. You don't care about the kids and their ability to celebrate with both of their families? Weren't you saying something about coparenting?



**Chalese Anderson** on 12/6/2019 5:50PM said:

Keep in mind it's not my job or responsibility to make sure they see your family. You haven't put forth any effort and so I'm done. Figure it out.

**Chalese Anderson** on 12/6/2019 5:50PM said:

I'm outside

**Chalese Anderson** on 12/6/2019 5:50PM said:

Your family is no longer my problem or concern thank god

**Adam Solinger** on 12/6/2019 7:00PM said:

When can I FaceTime with the kids?

**Adam Solinger** on 12/6/2019 7:15PM said:

Just a reminder I will be there tomorrow at 3 to pick up the kids, as mentioned previously.

**Chalese Anderson** on 12/6/2019 7:16PM said:

We have plans

**Chalese Anderson** on 12/6/2019 7:18PM said:

I haven't had them in two weeks. I get them for two days. Let me have time with my children for Fucks sake

**Adam Solinger** on 12/6/2019 7:23PM said:

You've known about this for months. I told you the first time I brought up Christmas Eve to you.






**Chalese Anderson** on 12/6/2019 7:24PM said:

We have plans that cannot be changed

**Adam Solinger** on 12/6/2019 7:26PM said:

Why would you make plans when you know I told you about this already? I'll be there tomorrow at 3. Please make sure the kids are ready. They're already expecting me and I told them I would be there.

**Chalese Anderson** on 12/6/2019 7:26PM said:

We will not be here 

**Chalese Anderson** on 12/6/2019 7:26PM said:

Show up all you want

**Chalese Anderson** on 12/6/2019 7:26PM said:

Goodnight

**Adam Solinger** on 12/6/2019 7:28PM said:

I'm telling you I will be there at 3 tomorrow as I told you months ago. The kids are expecting me to get them.

**Chalese Anderson** on 12/6/2019 7:38PM said:

We will not be here.

**Adam Solinger** on 12/6/2019 7:40PM said:

Ok, then where will you be so I can pick them up at 3, even though pick up is supposed to be at your house.



**Chalese Anderson** on 12/6/2019 8:25PM said:

Just like pickup is supposed to be at daycare

**Chalese Anderson** on 12/6/2019 8:26PM said:

You show up where ever you want. We have plans. You can see them Sunday at 6pm

**Adam Solinger** on 12/6/2019 8:26PM said:

To be clear, pick up is day care or our respective houses.

## 12/7/2019

**Adam Solinger** on 12/7/2019 2:41PM said:

I'm here a little early to pick up the kids at 3 as I noticed back in September.

**Chalese Anderson** on 12/7/2019 2:42PM said:

I told you last night no. I only get two day's with them and I haven't seen them in two weeks

**Adam Solinger** on 12/7/2019 2:43PM said:

I noticed this back in September. I reminded you last night. It's in the parenting calendar in AppClose. Please bring the kids out.

**Chalese Anderson** on 12/7/2019 2:43PM said:

No



**Chalese Anderson** on 12/7/2019 2:44PM said:

You get them the majority of the time. Let me have my time with my children

**Adam Solinger** on 12/7/2019 2:45PM said:

It's not about that. I told you about this several months ago. Please bring them outside.

**Chalese Anderson** on 12/7/2019 2:45PM said:

They will not be going with you. They will see you tomorrow

**Chalese Anderson** on 12/7/2019 2:46PM said:

Please leave my house

**Chalese Anderson** on 12/7/2019 2:48PM said:

Please don't act like a stalker and think just because you went across the street This behavior is ok

**Chalese Anderson** on 12/7/2019 2:55PM said:

I told you last night they weren't going with you today

**Chalese Anderson** on 12/7/2019 3:34PM said:

So to be clear, you claiming you asked for this in September is bull shit, right?

**Adam Solinger** on 12/7/2019 3:35PM said:

It's logged in appclose, including the calendar.



**Chalese Anderson** on 12/7/2019 3:36PM said:

Why are you so evil? Honestly. What more could you possibly do to me.

**Adam Solinger** on 12/7/2019 3:46PM said:

Evil? The only thing I'm trying to do is spend the time with my kids that I promised them and that you've been aware of for months. Once again, I'm not sure why you feel the need to lie to the police and tell them that I've withheld the kids for two months. I'll be there promptly at 6 tomorrow. Please make sure Josh is not there as he is an imminent danger to himself, everyone around him, myself, Jessica, Courtney and most importantly the kids with his predilection towards explosive violent behavior.

**Chalese Anderson** on 12/7/2019 3:46PM said:

I said I hadn't seen them in two weeks

**Chalese Anderson** on 12/7/2019 3:47PM said:

And josh will be here if he chooses

**Chalese Anderson** on 12/7/2019 3:48PM said:

And they're not just your kids. They are mine just as much.

**Adam Solinger** on 12/7/2019 3:52PM said:

The police officer was very specific that your claim was I withheld them for two months. He repeated it multiple times. I understand they are our kids. What are you telling

AppClose Complete Record of Text Communication  
Period: 12/6/2019 12:00AM to 12/7/2019 11:59PM  
Requesting Party: Adam Solinger, signed up on 3/20/2019 2:11PM  
Responding Party/Parties: Chalese Anderson, signed up on 3/22/2019 4:04PM,  
Adam Solinger, signed up on 3/20/2019 2:11PM

---



the kids as to why they're not getting picked up today like they expected?

**Chalese Anderson** on 12/7/2019 3:53PM said:

Then he misunderstood. Listen to the recording

**Adam Solinger** on 12/7/2019 3:54PM said:

What are you telling the kids?

**Chalese Anderson** on 12/7/2019 3:55PM said:

Nothing. They haven't even asked

**EXHIBIT 15**

**EXHIBIT 15**

**EXHIBIT 15**



# Payment Information

Payment Due Date  
**Apr. 23, 2019**

For online and phone payments,  
the deadline is 8pm ET.

---

New Balance  
**\$555.79**

Minimum Payment Due  
**\$25.00**

---

**LATE PAYMENT WARNING:** If we do not receive your minimum payment by your due date, you may have to pay a late fee of up to \$38.00.

**MINIMUM PAYMENT WARNING:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Minimum Payment	2 Years	\$691

If you would like information about credit counseling services, call 1-888-326-8055.

Account Summary	
Previous Balance	\$0.00
Payments	\$0.00
Other Credits	\$0.00
Transactions	+ \$555.79
Cash Advances	+ \$0.00
Fees Charged	+ \$0.00
Interest Charged	+ \$0.00
<b>New Balance</b>	<b>= \$555.79</b>
Credit Limit	\$10,000.00
Available Credit (as of Mar. 26, 2019)	\$9,444.21
Cash Advance Credit Limit	\$5,000.00
Available Credit for Cash Advances	\$5,000.00

Rewards Balance	Track and redeem your rewards with our mobile app or on <a href="http://www.capitalone.com">www.capitalone.com</a>	
<b>31,198</b>		
Previous Balance	Earned This Period	Redeemed This Period
30,503	695	0

### Account Notifications

- Welcome to your account notifications. Check back here each month for important updates about your account.

Pay or manage your account on our mobile app or at [www.capitalone.com](http://www.capitalone.com).

Customer Service: 1-800-955-7070

See reverse for Important Information



Please send us this portion of your statement and only one check (or one money order) to ensure your payment is processed promptly. Allow at least seven business days for delivery.

Payment Due Date: **Apr. 23, 2019**

Account Ending in 8403

New Balance  
**\$555.79**

Minimum Payment Due  
**\$25.00**

Amount Enclosed  
\$ \_\_\_\_\_

CHALESE SOLINGER  
8500 HIGHLAND VIEW AVE  
LAS VEGAS, NV 89145-5700




Capital One  
P.O. Box 60599  
City of Industry, CA 91716-0599



1 4147098275878403 26 0555790142180025005

Adam Solinger003647



**Pay your bill on the go.**  
Pay your bill securely and review transactions with the Capital One® mobile app.

**Text ONE to 80101 to download the app.**  
Messaging & Data rates may apply.

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**How can I Avoid Paying Interest Charges?** If you pay your statement's New Balance in full by the due date, we will not charge you interest on any new transactions that post to the purchase segment. If you have been paying your account in full with no Interest Charges, but then you do not pay your next New Balance in full, we will charge interest on the portion of the balance that you did not pay. For Cash Advances and Special Transfers, we will start charging Interest on the transaction date. Certain promotional offers may allow you to pay less than the total New Balance and avoid paying Interest Charges on new purchases. Please refer to the front of your statement for additional information.

**How is the Interest Charge applied?** Interest Charges accrue from the date of the transaction or the first day of the Billing Cycle. Interest Charges accrue on every unpaid amount until it is paid in full. This means you may owe Interest Charges even if you pay the entire New Balance for one Billing Cycle, but did not do so the previous Billing Cycle. Unpaid Interest Charges are added to the corresponding segment of your account.

**Do you assess a Minimum Interest Charge?** We may assess a minimum Interest Charge of \$0.00 for each Billing Cycle if your account is subject to an Interest Charge.

**How do you Calculate the Interest Charge?** We use a method called Average Daily Balance (including new transactions).

1. First, for each segment we take the beginning balance each day and add in new transactions and the periodic Interest Charge on the previous day's balance. Then we subtract any payments and credits for that segment as of that day. The result is the daily balance for each segment. However, if your previous statement balance was zero or a credit amount, new transactions which post to your purchase segment are not added to the daily balance.
2. Next, for each segment, we add the daily balances together and divide the sum by the number of days in the Billing Cycle. The result is the Average Daily Balance for each segment.
3. At the end of each Billing Cycle, we multiply your Average Daily Balance for each segment by the daily periodic rate (APR divided by 365) for that segment, and then we multiply the result by the number of days in the Billing Cycle. We add the Interest Charges for all segments together. The result is your total Interest Charge for the Billing Cycle.

The Average Daily Balance is referred to as the Balance Subject to Interest Rate in the Interest Charge Calculation section of this Statement.

NOTE: Due to rounding or a minimum Interest Charge, this calculation may vary slightly from the Interest Charge actually assessed.

**How can my Variable APR change?** Your APRs may increase or decrease based on one of the following indices (reported in *The Wall Street Journal*). The letter code below corresponds with the letter next to your APRs in the Interest Charge Calculation section of this statement.

Code next to your APR(s)	How do we calculate your APR(s)? Index + margin	When your APR(s) will change
P	Prime Rate + margin	The first day of the Billing Cycles that end in Jan., April, July, and Oct.
L	3 month LIBOR + margin	
D	Prime Rate + margin	The first day of each Billing Cycle.
F	1 month LIBOR + margin	

**How can I Avoid Membership Fees?** If a Renewal Notice is printed on this statement, you may avoid paying an annual membership Fee by contacting Customer Service no later than 45 days after the last day in the Billing Cycle covered by this statement to request that we close your account. To avoid paying a monthly membership Fee, close your account and we will stop assessing your monthly membership Fee.

**How can I Close My Account?** You can contact Customer Service anytime to request that we close your account.

**How do you Process Payments?** When you make a payment, you authorize us to initiate an ACH or electronic payment that will be debited from your bank account or other related account. When you provide a check or check information to make a payment, you authorize us to use information from the check to make a one-time ACH or other electronic transfer from your bank account. We may also process it as a check transaction. Funds may be withdrawn from your bank account as soon as the same day we process your payment.

**How do you Apply My Payment?** We generally apply payments up to your Minimum Payment first to the balance with the lowest APR (including 0% APR), and then to balances with higher APRs. We apply any part of your payment exceeding your Minimum Payment to the balance with the highest APR, and then to balances with lower APRs.

**Billing Rights Summary (Does not Apply to Small Business Accounts)**

**What To Do If You Think You Find A Mistake On Your Statement:** If you think there is an error on your statement, write to us at:

Capital One P.O. Box 30285 Salt Lake City, UT 84130-0285.

In your letter, give us the following information:

- Account information: Your name and account number.
- Dollar amount: The dollar amount of the suspected error.
- Description of Problem: If you think there is an error on your bill, describe what you believe is wrong and why you believe it is a mistake. You must contact us within 60 days after the error appeared on your statement. You must notify us of any potential errors in writing. You may call us or notify us electronically, but if you do we are not required to investigate any potential errors and you may have to pay the amount in question. We will notify you in writing within 30 days of our receipt of your letter. While we investigate whether or not there has been an error, the following are true:
  - We cannot try to collect the amount in question, or report you as delinquent on that amount. The charge in question may remain on your statement, and we may continue to charge you interest on that amount. But, if we determine that we made a mistake, you will not have to pay the amount in question or any interest or other fees related to that amount.
  - While you do not have to pay the amount in question until we send you a notice about the outcome of our investigation, you are responsible for the remainder of your balance.
  - We can apply any unpaid amount against your credit limit. Within 90 days of our receipt of your letter, we will send you a written notice explaining either that we corrected the error (to appear on your next statement) or the reasons we believe the bill is correct.

**Your Rights If You Are Dissatisfied With Your Purchase:** If you are dissatisfied with the goods or services that you have purchased with your credit card, and you have tried in good faith to correct the problem with the merchant, you may have the right not to pay the remaining amount due on the purchase. To use this right, the following must be true:

- 1) You must have used your credit card for the purchase. Purchases made with cash advances from an ATM or with a check that accesses your credit card account do not qualify; and
- 2) You must not yet have fully paid for the purchase.

If all of the criteria above are met and you are still dissatisfied with the purchase, contact us in writing at: Capital One, P.O. Box 30285, Salt Lake City, UT 84130-0285. While we investigate, the same rules apply to the disputed amount as discussed above. After we finish our investigation, we will tell you our decision. At that point, if we think you owe an amount and you do not pay we may report you as delinquent.

ETC-08

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11/01/16

## Changing Mailing Address?

You can change your address by signing into your account online or calling Customer Service.

**How do I Make Payments?** You may make your payment in several ways:

1. Online Banking by logging into your account;
2. Capital One Mobile Banking app for approved electronic devices;
3. Calling the telephone number listed on the front of this statement and providing the required payment information;
4. Sending mail payments to the address on the front of this statement with the payment coupon or your account information.

**When will you Credit My Payment?**

- For mobile, online or over the phone, as of the business day we receive it, as long as it is made by 8 p.m. ET.
- For mail, as of the business day we receive it, as long as it is received by 5 p.m. local time at our processing center. You must send the bottom portion of this statement and your check to the payment address on the front of this statement. Please allow at least seven (7) business days for mail delivery. Mailed payments received by us at any other location or payments in any other form may not be credited as of the day we receive them.

Adam Solinger003648





### Transactions

Visit [www.capitalone.com](http://www.capitalone.com) to see detailed transactions.

#### CHALESE SOLINGER #8403: Payments, Credits and Adjustments

Date	Description	Amount
------	-------------	--------

#### CHALESE SOLINGER #8403: Transactions

Date	Description	Amount
------	-------------	--------

Mar 13	WAL-MART #5070LAS VEGASNV	\$128.86
Mar 13	MCDONALD'S F28777LAS VEGASNV	\$14.26
Mar 15	PAYPAL *AMILIY4029357733	\$29.99
Mar 17	LITTLE CAESARS #3386LAS VEGASNV	\$16.24
Mar 18	PPRM- LAS VEGAS EAST HLAS VEGASNV	\$62.00
Mar 22	NV MED MARIJ PAT775-684-4200NV	\$50.00
Mar 22	NV MED MARIJ PAT775-684-4200NV	\$50.00
Mar 22	VALHALLA MEDICAL ASSOCLAS VEGASNV	\$89.00

CHALESE SOLINGER #8403: Total		\$440.35
-------------------------------	--	----------

#### JOSHUA LLOYD #1439: Transactions

Date	Description	Amount
------	-------------	--------

Mar 22	VALHALLA MEDICAL ASSOCLAS VEGASNV	\$89.00
Mar 24	CIGARETTE CIGAR & VAPE SHLAS VEGASNV	\$12.00
Mar 25	LOWES #02477*LAS VEGASNV	\$14.44

JOSHUA LLOYD #1439: Total		\$115.44
---------------------------	--	----------

Total Transactions for This Period		\$555.79
------------------------------------	--	----------

### Fees

Date	Description	Amount
------	-------------	--------

Total Fees for This Period		\$0.00
----------------------------	--	--------

### Interest Charged

Interest Charge on Purchases	\$0.00
------------------------------	--------

Interest Charge on Cash Advances	\$0.00
----------------------------------	--------

Interest Charge on Other Balances	\$0.00
-----------------------------------	--------

Total Interest for This Period		\$0.00
--------------------------------	--	--------

### Totals Year-to-Date

Total Fees charged	\$0.00
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Total Interest charged	\$0.00
------------------------	--------

### Interest Charge Calculation

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate(APR)	Balance Subject to Interest Rate	Interest Charge
Purchases	19.15% P	\$0.00	\$0.00
Cash Advances	27.15% P	\$0.00	\$0.00

P, L, D, F = Variable Rate. See reverse of page 1 for details.



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300086

Adam Solinger003649

001936

**EXHIBIT 16**

**EXHIBIT 16**

**EXHIBIT 16**

## **I. SUBJECTS:**

Name: Chalese Solinger  
Josh Lloyd  
Location: 4567 Curdsen Way  
Las Vegas, Nevada 89110

## **II. ADDITIONAL INVESTIGATIVE INQUIRIES:**

N/A

## **III. ASSIGNMENT:**

This will serve to transmit our investigative report in connection with the sub rosa investigation that was completed upon Chalese Solinger and Josh Lloyd.

## **IV. INVESTIGATIVE TIMELINE:**

**Thursday, October 31, 2019**

- 4:40 PM Our investigator departed for his destination.
- 5:16 PM The investigator arrived at Ms. Solinger's residence:
- 4567 Curdsen Way  
Las Vegas, Nevada 89110**
- The red GMC pickup truck observed during our previous surveillance, bearing Nevada license plate number 947E73, was parked in the front yard. The GMC Sierra pickup truck observed during our previous surveillance, bearing Florida license plate number LKJH57, was parked on the driveway. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with the Subjects. A surveillance position with a view of the residence was established. **(VIDEO OBTAINED)**
- 5:56 PM A black Toyota Camry, license plate not visible, arrived and parked curbside in front of the residence. A woman exited the vehicle and carried a child into the residence.
- 6:27 PM The woman exited the residence and carried the child to her vehicle. Ms. Solinger and Mr. Lloyd exited the residence with the children and entered the GMC Sierra. Mr. Lloyd threw a stroller in the bed of the vehicle and entered on the driver's side.

6:31 PM Mr. Lloyd and Ms. Solinger departed the area followed by the woman in the Toyota Camry.

6:56 PM They traveled on Sunrise Highlands Way, out of view, as the investigator became detained by traffic and pedestrians. As traffic conditions permitted, a search of the area was conducted to locate the Subjects.

7:40 PM The GMC Sierra was located curbside on Merrill Summit Court. The Subjects were not located by the vehicles. The investigator searched the area on foot.

7:54 PM As the investigator was returning to the location of the vehicles, Mr. Lloyd drove past the investigator with Ms. Solinger in the passenger seat of the GMC Sierra, followed by the woman and child in the Toyota Camry. Mobile surveillance was initiated.

8:10 PM They traveled on Hollywood Boulevard into one lane of heavy traffic, out of view, as the investigator became detained by the traffic. As traffic conditions permitted, the investigator departed for his destination.

8:26 PM The investigator arrived at the Subjects' residence:

**4567 Curdsen Way  
Las Vegas, Nevada 89110**

The red GMC pickup truck remained parked in the front yard. No other vehicles were observed. The investigator departed for his destination.

8:51 PM The investigator arrived at the residence on Grand Clover Lane:

**2256 Grand Clover Lane  
Las Vegas, Nevada 89156**

No vehicles were observed. The investigator departed for his destination.

9:10 PM The investigator arrived at the Subjects' residence:

**4567 Curdsen Way  
Las Vegas, Nevada 89110**

The GMC Sierra was parked on the driveway. The Toyota Camry was parked curbside in front of the residence. A surveillance position in the vicinity of the residence was established. (VIDEO OBTAINED)

9:25 PM No activity was observed that was thought to be associated with the Subjects. Pursuant to the Client's instruction, surveillance was terminated, and the investigator departed for his destination.

**EXHIBIT 17**

**EXHIBIT 17**

**EXHIBIT 17**

10:42



Nov 1, 19 - Feb 29, 20

Jessica



9 of 12 matches



WED, FEB 5

We have dinner plans tonight.  
Can I pick up the kids early

11:57 AM

No. We also have dinner plans.  
However, if your dinner plans keep  
you late you are more than  
welcome to pick them up late.

12:09 PM ✓

No. I will be right outside your  
house at 6pm then

12:10 PM

Sounds good.

12:24 PM ✓

And please keep exchanges  
between us. Your girlfriend has  
no business in this

Export

10:42



Nov 1, 19 - Feb 29, 20

Jessica



9 of 12 matches



12:24 PM

Why do you always have to try to argue about something? Jessica doesn't cause any issues and the kids like saying goodbye to her. The kids always ask her to come outside and hold their hands.

12:37 PM



I have a problem with her. She can say goodbye in the house.

12:40 PM

She has been nothing but cordial to you, even after your insults to her and her daughter. She hasn't done a thing to you and has always been more than accommodating to you. How can you have a problem with her when she hasn't done anything to you? The kids love her, she's amazing to the kids and to me. I love her so much, she's wonderful, that should be the only

Export





Nov 1, 19 - Feb 29, 20

Jessica



10 of 12 matches



She has been nothing but cordial to you, even after your insults to her and her daughter. She hasn't done a thing to you and has always been more than accommodating to you. How can you have a problem with her when she hasn't done anything to you? The kids love her, she's amazing to the kids and treats them wonderfully, that should be the only thing that matters, she loves and cares for those kids and the kids want her there.

This is about the kids, not you. They would be confused if she told them "no I'm not walking you out". That would hurt their feelings. Stop making this about you. Start looking at things from the kids' perspective.

Export





10:42 ↗



Nov 1, 19 - Feb 29, 20

Jessica



10 of 12 matches



It's not a hard thing to explain  
that daddy takes you outside to  
mommy. I have a problem with  
her, her daughter, and you.  
Please stop making things so  
difficult and hostile

12:53 PM

You're the only one making it  
hostile Chalese. Jessica has always  
been part of goodbyes, the kids ask  
her to be there, I'm not changing  
things all because you are angry.  
Again, look at it from the kids  
perspective. Now if you will excuse  
me, I need to work.

1:00 PM ✓

You are intentionally causing  
conflict

1:00 PM

Export

10:43



Nov 1, 19 - Feb 29, 20

Jessica



11 of 12 matches



THU, FEB 6

Marie hit her face this morning  
climbing into the truck, she will  
most likely have a bruise

8:53 AM

What did she hit her face on?  
Please save the camera footage of  
the fall.

10:46 AM ✓

Car seat

10:47 AM

No camera footage we weren't at  
the house

10:47 AM

She hit the cup holder on her  
seat

10:48 AM

Export

10:43



Nov 1, 19 - Feb 29, 20

Jessica



11 of 12 matches



10:40 AM

Did you happen to be at the daycare parking lot?

10:53 AM



No. Why are you so insistent on footage? She's two, she's going to get bumps bruises and scrapes. I was just letting you know

11:58 AM

It just worries because there's constant unexplained bruises. I don't understand why the location of where it happened is so secret. Can you please take a picture of it so I can see how bad it is? Also, why are the kids not in school today?

12:03 PM



I was at josh's dads house. We were dropping off Jesse. It was

Export

10:43 ↗



Nov 1, 19 - Feb 29, 20

Jessica



11 of 12 matches



I was at josh's dads house. We were dropping off Jesse. It was approximately 8:50ish am. She climbed through the front seat and honked the horn then climbed into the backseat to grab a toy and get in her car seat. As she was climbing into her seat her foot slipped and she hit her cheek on the cup holder.

12:06 PM

They are in school but if they weren't it's my day anyway

12:07 PM

Can you please take a picture when you pick her up?

12:08 PM ✓



Export

10:43



Nov 1, 19 - Feb 29, 20

Jessica



11 of 12 matches



This was the second I strapped  
her in

12:09 PM

I understand it's your day, but Maq  
is in pre-k and needs to go to his  
classes unless he's sick because he  
needs to be ready for kindergarten.  
The school district already  
implemented an IEP based upon  
his speech delay. We don't need  
him further delayed.

12:32 PM

I get them two day's. If I have the  
day off I'm not taking them to  
school. Maq is in daycare, call it  
pre-k if you want but it doesn't  
change the fact.

12:34 PM

Export

It's pre-k. It gets him ready for



10:43



Nov 1, 19 - Feb 29, 20

Jessica



11 of 12 matches



12:32 PM



I get them two day's. If I have the day off I'm not taking them to school. Maq is in daycare, call it pre-k if you want but it doesn't change the fact.

12:34 PM

It's pre-k. It gets him ready for kindergarten. He needs the help getting ready so that he can be as best prepared as possible to start school. I don't want him to fall even further behind. You already refuse to do anything with speech therapy. Please do not further harm his future. It is not in his best interest. What are you going to do when he starts kindergarten? Keep him out for the same reasoning that it's "just kindergarten" and it's your time? What about first grade? See... Your desires have to fall by

Export

10:43



Nov 1, 19 - Feb 29, 20

Jessica

11 of 12 matches

Actual school is different.  
Seriously, how self absorbed are  
you? Do you know what these  
kids need more than daycare,  
time with their mother, me. Stop  
telling me how to parent. I don't  
care what your opinion is. I will  
do as I see fit for my children.  
Have a good day, they will be  
waiting for your call at 7pm

12:39 PM

Unfortunately until you are  
willing to be more cooperative I  
will not allow Jessica to leave  
with our children.

6:37 PM

If she shows up to my house I will  
call the police

6:37 PM

Export

10:43



Nov 1, 19 - Feb 29, 20

Jessica



11 of 12 matches



If she shows up to my house I will  
call the police

6:37 PM

What do you mean more  
cooperative?

6:38 PM



You realize Maq is one step away  
from being diagnosed special  
needs based upon your actions,  
right? You constantly taking him out  
of school and not working on his  
words with him is what's driving  
that. He needs to learn, why do you  
insist on holding him back?

6:54 PM



You realize maq has the speech  
delay because he couldn't hear  
until I advocated for him to get  
tubes in his ears, right?

Export



10:43



Nov 1, 19 - Feb 29, 20

Jessica

11 of 12 matches

You realize maq has the speech delay because he couldn't hear until I advocated for him to get tubes in his ears, right?

6:55 PM

You are allowed to pick him up.  
She is not. End of story.  
Goodnight

6:55 PM

Also, your support from December, January, and February are past due along with the 10k in legal fees. Please pay this per the court order

6:57 PM

He has a speech delay because you took him out of speech therapy in January of 2019 against my advice. Who knows where

Export

10:43



Nov 1, 19 - Feb 29, 20

Jessica



12 of 12 matches



You are so wrong it is hilarious.  
Tell your girlfriend to mind her  
business and her kid too

6:30 PM

The kids wanted Jessica and her daughter out there. Courtney didn't say a word to you but they asked her to be out there because as we were walking out Michael said he was afraid to go to his moms house and Courtney was encouraging him that there isn't anything to be afraid of (although I think she is wrong and I think he should be afraid). Jessica just was concerned when you yanked Marie up and threw her head back, what you did was wrong and she only stated for Marie to watch her head because of how rough you were. She cares about those kids that's why she said something. She

Export

11:22



Nov 1, 19 - Feb 29, 20

Jessica

12 of 12 matches

WED, FEB 19

Can I pick the kids up early

8:47 AM

Can I pick up the kids early

1:04 PM

No.

1:57 PM ✓

I am off work. You're telling me  
you'd rather our kids sit at  
daycare instead?

1:58 PM

Yes, I know they're safe there.

2:16 PM ✓

They are safest when they are  
with me. They always have been.  
Now please, can I go pick the  
up early

Export

001954

11:22



Nov 1, 19 - Feb 29, 20

Jessica



12 of 12 matches



2:17 PM

I won't be feeding the kids dinner tonight.

4:49 PM



What are you talking about? Every action you take is a clear danger to the children and it scares me that you don't see that. You have never had their best interest in mind and the abuse and neglect is aggressively getting worse.

5:04 PM



I'm outside

5:35 PM

I'll bring them out as soon as they are dressed and went potty. They won't be bathed.

Export



You almost gave Marie whiplash



11:22



Nov 1, 19 - Feb 29, 20

Jessica



12 of 12 matches



I'll bring them out as soon as they are dressed and went potty. They won't be bathed.

5:41 PM



You almost gave Marie whiplash snatching her like that. Why? Because you're mad at me because I said good bye to Marie? You really don't see the danger you are to the kids?

6:15 PM



You are so wrong it is hilarious. Tell your girlfriend to mind her business and her kid too

6:30 PM

The kids wanted Jessica and her daughter out there. Courtney didn't say a word to you but they her to be out there because

Export

11:22



Nov 1, 19 - Feb 29, 20

Jessica



12 of 12 matches



The kids wanted Jessica and her daughter out there. Courtney didn't say a word to you but they asked her to be out there because as we were walking out Michael said he was afraid to go to his moms house and Courtney was encouraging him that there isn't anything to be afraid of (although I think she is wrong and I think he should be afraid). Jessica just was concerned when you yanked Marie up and threw her head back, what you did was wrong and she only stated for Marie to watch her head because of how rough you were. She cares about those kids and that's why she said something. She doesn't want to see them get hurt.

6:40 PM



I don't believe e anything yo  
have to say. You are a liar and

Export

11:22



Nov 1, 19 - Feb 29, 20

Jessica



12 of 12 matches



6:40 PM



I don't believe e anything you have to say. You are a liar and a cheater. You only care for yourself. Now, leave me alone

6:42 PM

THU, FEB 20

Are the kids ok? Are they sick? I noticed Michael isn't in pre-k and Marie isn't in day care.

12:20 PM



Are you planning on putting Michael in pre-k tomorrow so he can go to soccer and not be delayed in his preparation for kindergarten? Are you putting Marie in day care tomorrow? I need to know because if not, I need to pick up their nap mats to wash them.

Export



11:23



Nov 1, 19 - Feb 29, 20

Jessica



11 of 12 matches



5:55 PM



Please don't yank the kids when you get them. You grabbed Michael by the arm to the point he couldn't keep up. Lifting him up like that can dislocate his shoulder. There's no need for any of that. You don't need to be aggressive when you pick them up just because you're mad at me. They don't deserve that. Please stop lashing out at the kids.

6:09 PM



Please stop putting your girlfriend in situations she doesn't belong

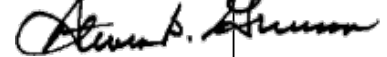
6:17 PM

Do not tell me what to do with my children. You are the one who keeps making these issues

6:17 PM

Export





**MOT**

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  
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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,	)	
	)	<b>Oral argument is requested</b>
Defendant.	)	

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 FOURTEEN (14) DAYS 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 A HEARING PRIOR TO THE SCHEDULED HEARING DATE.

**MOTION FOR A CHANGE OF CUSTODY BASED ON  
DEFENDANT'S ENDANGERMENT OF THE MINOR  
CHILDREN; FOR MARIE'S BIRTH CERTIFICATE; FOR  
ATTORNEY'S FEES AND COSTS AND RELATED RELIEF**

**NOW INTO COURT** comes Plaintiff, ADAM MICHAEL SOLINGER, by and through his attorney, Vincent Mayo, Esq., of The Abrams & Mayo Law Firm, and hereby submits his *MOTION FOR A CHANGE OF CUSTODY BASED ON DEFENDANT'S*

1 *ENDANGERMENT OF THE MINOR CHILDREN; FOR MARIE'S*  
2 *BIRTH CERTIFICATE; ATTORNEYS FEES AND COSTS AND*  
3 *RELATED RELIEF.*

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

8 Dated Tuesday, March 31, 2020.

9 Respectfully Submitted,

10 THE ABRAMS & MAYO LAW FIRM

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

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **I. STATEMENT OF FACTS**

16 Plaintiff, ADAM SOLINGER ("Adam") and Defendant, CHALESE  
17 SOLINGER, were married on May 12, 2012 in Las Vegas, Nevada. There  
18 are two (2) minor children of the marriage, to wit: Michael Adam  
19 Solinger ("Michael"), born June 16, 2015 (4 years of age); and Marie  
20 Leona Solinger ("Marie"), born August 28, 2017 (2 year of age). Adam is  
21 31 years old and Chalese is 29 years old.

1        Within the last two weeks, numerous federal and state mandates  
2 and guidelines related to social distancing have been in effect in an  
3 attempt to protect people from the COVID-19, which has now infected  
4 over 173,000 and killed 3,390 people in the U.S. alone. Worse, those  
5 numbers are expected to grow rapidly in the coming weeks.

6        Adam, in an effort to protect the children, has taken a number of  
7 preventive measures. This includes keeping them from public places,  
8 practicing social distancing, and everyone in the house working from  
9 home.

10       Unfortunately, Chalese has not followed similar and critical  
11 protocols, thereby endangering the children. This started on March 19<sup>th</sup>  
12 when Chalese and Josh got into a huge fight over his upcoming  
13 deposition and trial subpoena. As a result of the fight, Chalese took the  
14 children over to Josh's parent's house. They spent a portion of the night  
15 there until Josh cooled down. Chalese then woke the children up, in the  
16 middle of the night to take them home. Chalese admitted the same to  
17 Adam via AppClose after Adam questioned Chalese over why she would  
18 unnecessarily take the children to another house. Adam also brought it  
19 to Chalese's attention that she needed to bath the children everyday  
20 while in her care to ensure the children are as clean as possible (as  
21

1 Chalese has admitted that she does not, often resulting in rashes to the  
2 children, especially Marie). Chalese did not confirm she would.

3 The fight continued the next day, March 20<sup>th</sup>, because Chalese was  
4 going to go drop the children off at Josh's parent's house again because  
5 she had "an appointment she couldn't move." It took multiple messages  
6 and begging by Adam to get Chalese to agree to let him pick the children  
7 up instead of taking them over to another house again with unknown  
8 social distancing protocols.

9 On March 27<sup>th</sup>, Adam attempted to speak to Chalese about this and  
10 impress upon her the real threat of exposure posed by failing to social  
11 distance, keeping the children bathed, etc. Chalese essentially blew  
12 Adam off.<sup>1</sup> Worse yet, when Chalese got the children that afternoon for  
13 her visitation time, she had a party over at her house with multiple  
14 people present. Adam's PI noted these people consisted of at least two  
15 men, a woman, a baby, and a dog. Additionally, they were driving a new  
16 car with dealership installed paper plates implying the vehicle was  
17 recently purchased and an unknown number of people were in contact  
18 with the same vehicle during this crisis. Adam's PI was not able to  
19 confirm who else, other than Chalese, Josh, and the children, may have  
20 been at the house prior to him arriving. Michael said that he only knew

---

21 <sup>1</sup> See the AppClose messages between the parties, attached as **Exhibit 1**.

1 the name of one of the guys, Bob, and the baby, Baylie. He did not know  
2 who the others were.

3 The next day, March 28<sup>th</sup>, Josh took his son, Jesse, to the hardware  
4 store exposing themselves to more contact with people unnecessarily.  
5 Josh's mother came over to Chalese's home and dropped some items off  
6 at the house. Further, Michael told Adam that Chalese now has farm  
7 animals, chickens, at her house.

8 The next day, March 29<sup>th</sup>, Josh purchased an ice cream and a  
9 beverage from an ice cream truck – a veritable plague wagon. Then Josh  
10 took Arielle and Jesse – who regularly interact with Michael and Marie,  
11 grocery shopping in a busy store.

12 On an unrelated matter, Adam is attempting to enroll the children  
13 in his new health insurance plan. Adam referenced this plan at the last  
14 court hearing, explaining that it was just as good as his prior plan but  
15 much less expensive. However, in order to enroll Marie, Adam needs  
16 Marie's Birth Certificate, which is in Chalese's possession. Adam asked  
17 for it from Chalese on March 29<sup>th</sup>, explaining to her why he needed it. In  
18 response, Chalese defiantly stated, "No, you may not."<sup>2</sup>

19 ///

20 ///

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21 <sup>2</sup> *Id.*

1 **II. LAW AND ARGUMENT**

2 **A. Adam Should be Awarded Sole Physical Custody of**  
3 **the Minor Children Until Chalese is Ordered to**  
4 **Abide by Social Distancing Mandates**

5 Chalese's history of terrible judgment and child neglect continues.  
6 As this Court is aware, there is a currently scheduled contempt hearing  
7 where Adam plans to present evidence showing that the children are in  
8 imminent danger every time they are with Chalese and that this danger  
9 warrants a change in custody to supervised visits to protect the children.  
10 Knowing full well that this was coming, Chalese remained steadfast in  
11 her refusal to take precautionary measures to protect the children from  
12 the deadly coronavirus. In the past week alone, Chalese has taken the  
13 children to multiple homes, ***had a party at her home right after***  
14 ***Adam tried to speak to Chalese about protecting the children,***  
15 and let Josh take his children to a busy public place, knowing his  
16 children would be physically interacting with the parties' children right  
17 afterwards.

18 Such failures to protect the children from COVID-19 are  
19 unacceptable and extremely reckless behavior on Chalese's part. Adam  
20 loves his children more than anything and it is unbelievable Chalese  
21 would risk their lives in such an arbitrary fashion, especially when the

1 ability to minimize the danger to them is within her control. As Chalese  
2 failed to respond with Adam and work with him, he is forced to resort to  
3 filing this motion.

4 **B. Adam Needs Marie's Birth Certificate**

5 Chalese refuses to provide Adam Marie's Birth Certificate so that  
6 he can enroll her in his new, but much less expensive, health insurance  
7 plan. Chalese has not even provided a reason for her refusal. Adam  
8 therefore asks the Court to order Chalese to do so or else, Chalese can be  
9 solely responsible to keep Marie on the old insurance plan – which will  
10 result in paying more than she otherwise would have to as the total cost  
11 per child under the old plan is over \$200.

12 **C. Adam Should be Awarded Attorney's Fees and Costs**

13 Chalese has once more refused to act in the children's best interest,  
14 forcing Adam to once more seek immediate relief from this Court. Adam,  
15 as a result, should be made whole in terms of the fees and cost of doing  
16 so. Therefore, under NRS 125C.250, 18.010 and EDCR 7.60, Adam  
17 should be awarded attorney's fees. To that end, Adam can provide a  
18 Memo of Fees and Costs upon order of the court.

19 ///

20 ///

21 ///

1 **III. CONCLUSION**

2 Based upon the foregoing, Adam respectfully requests that this  
3 Honorable Court grant the relief requested in this Motion in its entirety,  
4 as well as any further relief the Court deems proper and just.

5 Dated Tuesday, March 31, 2020.

6 Respectfully Submitted:

7 THE ABRAMS & MAYO LAW FIRM

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



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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *MOTION FOR A CHANGE OF CUSTODY BASED ON DEFENDANT’S ENDANGERMENT OF THE MINOR CHILDREN; FOR MARIE’S BIRTH CERTIFICATE; ATTORNEY’S FEES AND COSTS AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Tuesday, March 31, 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

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

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

ADAM MICHAEL SOLINGER

Plaintiff/Petitioner

v.

CHALESE MARIE SOLINGER

Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

<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:

☒\$0 ☐\$25 ☐\$57 ☐\$82 ☐\$129 ☐\$154

Party filing Motion/Opposition: Plaintiff/Petitioner Date 03/31/2020

Signature of Party or Preparer /s/ Julie Schoen

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

# Conversations

## 3/20/2020

**Adam Solinger** on 3/20/2020 12:33PM said:

Please remind Michael to take a good nap because we're having movie night tonight. Additionally, can I pick the kids up early?

**Chalese Anderson** on 3/20/2020 1:22PM said:

You can pick them up from josh's dads house and only because I have an appointment that requires little contact that I didn't realize was today

**Chalese Anderson** on 3/20/2020 1:24PM said:

He will be babysitting them. I will be dropping them off shortly

**Adam Solinger** on 3/20/2020 1:32PM said:

Ok

**Adam Solinger** on 3/20/2020 1:35PM said:

Instead of taking them to another home, can you drop them off with Jessica at her work and then she can bring them home to me right now?

**Adam Solinger** on 3/20/2020 1:36PM said:

It's about 10 minutes from you.

**Chalese Anderson** on 3/20/2020 1:36PM said:

I cannot

**Adam Solinger** on 3/20/2020 1:36PM said:

Or she's willing to drive to you right now, if need be.

**Chalese Anderson** on 3/20/2020 1:38PM said:

Fine

**Chalese Anderson** on 3/20/2020 1:38PM said:

She has to hurry

**Adam Solinger** on 3/20/2020 1:38PM said:

She's leaving now.

## 3/22/2020

**Adam Solinger** on 3/22/2020 7:32PM said:

Will you please agree not to cut Marie's hair and her bangs?  
We're planning on having a photo shoot in May and we have  
a specific idea of how we want Marie's hair. If it's cut, we  
won't be able to get the style we have in mind.

**Chalese Anderson** on 3/22/2020 8:11PM said:

As her mother I am entitled to do as I please with her hair

**Adam Solinger** on 3/22/2020 8:13PM said:

I get it, you're her mother and I'm her dad. I'm simply asking  
as a courtesy, can you please agree to not cut it until after  
these pictures?

## 3/26/2020

**Chalese Anderson** on 3/26/2020 7:01PM said:

You need to let me talk to my children

**Adam Solinger** on 3/26/2020 7:15PM said:

I tried to have our children call and you didn't answer. They are in bed.

**Adam Solinger** on 3/26/2020 7:47PM said:

Please do not underestimate the seriousness of this virus. The kids need to be home and away from all outsiders. They don't need to be taken somewhere else in the middle of the night and then woke up and taken home.

**Adam Solinger** on 3/26/2020 7:47PM sent:

 (See attached  on page 12)

## 3/27/2020

**Chalese Anderson** on 3/27/2020 8:18AM said:

Don't lecture me on keeping my children safe

**Chalese Anderson** on 3/27/2020 10:43AM said:

Can I pick them up early?

**Chalese Anderson** on 3/27/2020 1:27PM said:

Can I pick them up early?

**Adam Solinger** on 3/27/2020 1:49PM said:

I'm not lecturing you, this is serious Chalese, everything isn't about you, its about OUR kids. You didn't bathe them while they were with you, the CDC says to bathe everyday. You took them to someone else's home, making exposure go up. It's about their safety, not lecturing you. Co-parenting involves talking about this kind of stuff especially at a time like this. We can't just have different ways of handling this pandemic. This is way too big to just ignore and not discuss. Without a unified position, the efforts of the other are futile And no, you may not.

**Chalese Anderson** on 3/27/2020 2:01PM said:

They went to my trailer. That's the only place they went. My home and my trailer. Now stop.

**Adam Solinger** on 3/27/2020 3:50PM said:

Not to mention, Josh's Dad and step mom came over because he flipped out over getting served with the deposition subpoena. Tell me, why was Michael scared for me when that happened? Are the kids going to be safe? Because Michael said he did not feel safe last week.

**Chalese Anderson** on 3/27/2020 3:59PM said:

Tell me why you are being such difficult coparent? Tell me why you think you're above everyone else and can lecture me over not taking this seriously for our kids but you let them have play dates and continue to take them to the



park? Please, stop your nonsense and quit causing problems.

**Adam Solinger** on 3/27/2020 4:19PM said:

You mean his play date at the park with Steven? That happened well before the pandemic outbreak? They have had zero play dates and they haven't been to a park since the lockdown.

**Chalese Anderson** on 3/27/2020 4:20PM said:

Really? Because two nights ago you were at the park while I called, and were there the night before. Weird

**Chalese Anderson** on 3/27/2020 4:21PM said:

Monday for sure you were and I believe the same for Sunday

**Chalese Anderson** on 3/27/2020 4:21PM said:

Monday and Tuesday I have proof

**Chalese Anderson** on 3/27/2020 4:22PM said:

So please, stop.

**Adam Solinger** on 3/27/2020 4:25PM said:

They weren't at a park. We went for a walk around the neighborhood.

**Chalese Anderson** on 3/27/2020 4:25PM said:

Say what you want. I record every video

**Adam Solinger** on 3/27/2020 4:33PM said:

Just like the other ones you claim you recorded without permission which have never been produced? Ever? Those ones that are proof of a felony? Stop deflecting from the fact that you took the kids to another house. You brought other people to your house unnecessarily. You don't bathe the kids. You put the kids in danger having Josh around. Josh is committing enough crime for the both of you. I would stop while you're ahead and not claim you violated wiretap laws. So I ask again, are the kids safe there?

**Chalese Anderson** on 3/27/2020 4:34PM said:

You are a cheater, a liar, and a manipulator. My children are safest with me.

**Chalese Anderson** on 3/27/2020 4:36PM said:

I am done going back and forth with you. Please make sure my kids are ready for me when I get there.

**Adam Solinger** on 3/27/2020 4:56PM said:

Look, I just want to make sure the kids are safe. There's a very strong possibility that Josh will get something in the mail this weekend that he won't like. Are the kids going to be safe? Michael said he was scared. I want to make sure the kids are safe from everything, including Josh and the corona virus.

**Chalese Anderson** on 3/27/2020 5:02PM said:

I want to protect them from you and your evil doing. That is all.

**Adam Solinger** on 3/27/2020 5:08PM said:

What have I done that is evil? I have never done anything to harm or scare them. They are actively scared at your house, crying because they are scared. Why is it so hard for you to just say that you will protect them? That you will make sure they don't come into contact with other people? That you will keep them out of stores and other homes? That they will wash their hands and have baths? These should be easy commitments that don't require a debate. I don't understand.

**Chalese Anderson** on 3/27/2020 5:42PM said:

I'm outside

**Adam Solinger** on 3/27/2020 5:43PM said:

We're finishing up baths and will be out by 6.

**Adam Solinger** on 3/27/2020 5:44PM said:

They've already eaten dinner.

**3/28/2020**

**Adam Solinger** on 3/28/2020 7:01PM said:

Please have the kids call me.

**Chalese Anderson** on 3/28/2020 7:10PM said:

Kids went to bed early

**Adam Solinger** on 3/28/2020 7:11PM said:

Are they ok? Why did they go to bed early?

**Chalese Anderson** on 3/28/2020 7:11PM said:

They're just fine. They will see you tomorrow.

**Adam Solinger** on 3/28/2020 7:12PM said:

So, I want to be clear, if the kids go to bed early, I don't need to try to have them call first like I always do?

**Adam Solinger** on 3/28/2020 7:53PM said:

??? I just need to know the policy for future reference.

## 3/29/2020

**Adam Solinger** on 3/29/2020 7:40AM said:

Can I FaceTime with the kids this morning since I couldn't last night?

**Adam Solinger** on 3/29/2020 8:45AM said:

I need Marie's birth certificate to get her enrolled in health insurance. I ordered one but it won't be here for a couple of weeks and I need it this week otherwise I can't enroll her. Can you have it ready when I pick up the kids today? Also, can I pick them up early?

**Chalese Anderson** on 3/29/2020 9:42AM said:

No you may not

**Adam Solinger** on 3/29/2020 11:02AM said:

No I may not have the birth certificate, no I may not pick them up early or no I may not FaceTime with them?

**Chalese Anderson** on 3/29/2020 11:05AM said:

You cannot pick up the kids until 6pm

**Adam Solinger** on 3/29/2020 11:08AM said:

Can I FaceTime with the kids because they went to bed early last night and couldn't then?

**Chalese Anderson** on 3/29/2020 11:24AM said:

No we are busy

**Adam Solinger** on 3/29/2020 11:25AM said:

Ok please don't forget her birth certificate tonight.

**Adam Solinger** on 3/29/2020 2:29PM said:

Are you feeding the kids dinner before I pick them up? I need to know so I can have something ready at home so I'm not stopping for fast food with everything going on right now.

**Adam Solinger** on 3/29/2020 4:09PM said:

Are you feeding the kids?

**Chalese Anderson** on 3/29/2020 4:13PM said:

Yes

**Adam Solinger** on 3/29/2020 5:54PM said:

I'm outside and don't forget Marie's birth certificate

**Chalese Anderson** on 3/29/2020 5:55PM said:

Kids will be out at 6

**Chalese Anderson** on 3/29/2020 6:41PM said:

Please, in the future, don't bring the kids in on adult conversation.

**Adam Solinger** on 3/29/2020 6:43PM said:

Please explain how asking for Marie's birth certificate is involving them in an adult conversation. And FYI, You understand I need her birth certificate in order to enroll Marie. If you don't get it I will be forced to keep her in the other insurance which will be your responsibility. Please drop it off tomorrow so I can enroll her.

**Adam Solinger** on 3/29/2020 6:56PM said:

Why does Marie have diaper rash again?

## 3/30/2020

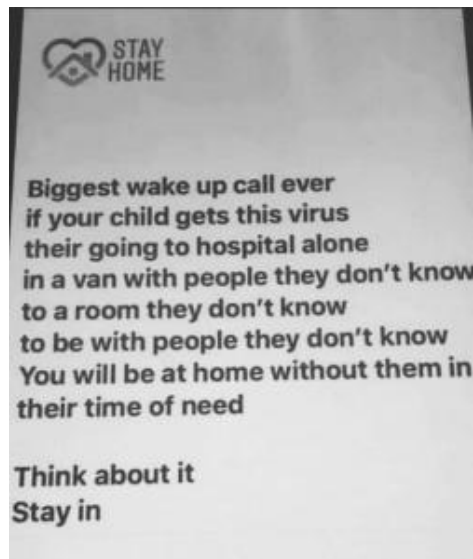
**Adam Solinger** on 3/30/2020 11:57AM said:

What time can I expect the birth certificate to be dropped off?

***Adam Solinger*** on 3/30/2020 12:37PM said:

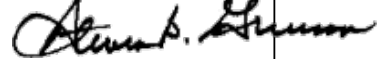
Chalese, this isn't a time to play games. Are you going to give me the birth certificate or not?

## Attachment



Img. 612f12ad-5bee-4061-83cf-b4bcf171b233.JPG to page 3





**EXMT**

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.	)	

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

COMES NOW Plaintiff, Adam Solinger, by and through his attorney of record, Vincent Mayo, Esq., of The Abrams & Mayo Law Firm, and hereby submits this Ex Parte Motion for an Order Shortening Time pursuant to EDCR 2.26, requesting that this Court shorten the time in which to hear his *MOTION FOR A CHANGE OF CUSTODY BASED ON DEFENDANT'S ENDANGERMENT OF THE MINOR CHILDREN; FOR MARIE'S BIRTH CERTIFICATE; FOR ATTORNEY'S*

1 *FEES AND COSTS AND RELATED RELIEF*, which is not yet scheduled  
2 to be heard.

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

5 DATED: Tuesday, March 31, 2020.

6 Respectfully Submitted,

7 THE ABRAMS & MAYO LAW FIRM

8 /s/ Vincent Mayo, Esq.

9 Vincent Mayo, Esq.

10 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

11 Tel: (702) 222-4021

Fax: (702) 248-9750

Attorney for Plaintiff

12 / / /

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21 / / /

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

2           1.     I, Vincent Mayo, Esq., declare under penalty of perjury  
3 under the law of the State of Nevada, pursuant to NRS 53.045, that the  
4 below stated facts are true and correct to the best of my knowledge.

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

13          3.     As this Court is well aware, within the last two weeks,  
14 numerous federal and state mandates and guidelines related to social  
15 distancing have been in effect in an attempt to protect people from the  
16 COVID-19, which has now infected over 173,000 and killed 3,390 people  
17 in the U.S. alone. Worse, those numbers are expected to grow rapidly in  
18 the coming weeks.

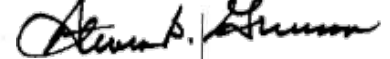
19          4.     Adam has done his best to protect the children from the  
20 deadly disease, as he detailed in his Motion. Unfortunately, Chalese has  
21 not followed similar and critical protocols, thereby endangering the

children. This has included Chalese in the last couple of days taking the 4 and 2 year olds over to multiple residence's houses, having a party at her home with numerous guests while the children were present and Josh taking his children – whom Michael and Marie are regularly in contact with – to a busy grocery store.

5. Therefore, based on the urgency of the matter and Chalese's refusal to co-parent with Adam, it is requested that this matter be heard on shortened time, especially since Adam will be left with no option but to deny Chalese visitation with the children in order to ensure their safety and health. Adam should not have to explain to Chalese that risking the children being infected with COVID-19, a deadly disease, and potentially having to admit the children to a hospital where they would have to be left alone due to hospital restrictions, is extremely serious and something that neither should take a chance on.

Dated this 31<sup>st</sup> day of March, 2020.

/s/ Vincent Mayo, Esq.  
VINCENT MAYO, ESQ.



1 **SAO**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: vmgroup@theabramslawfirm.com

Attorney for Plaintiff

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 **STIPULATION AND ORDER TO PROVIDE CPS RECORDS AND**  
15 **DRUG TEST RESULTS TO THE CHILD CUSTODY**  
16 **EVALUATOR**

17 **IT IS HEREBY STIPULATED AND AGREED** by KRISTINA

18 C. KIRIGIN, ESQ., attorney for Defendant, CHALESE MARIE

19 SOLINGER (hereinafter referred to as "Chalese"), and VINCENT MAYO,

20 ESQ., attorney for Plaintiff, ADAM MICHAEL SOLINGER (hereinafter

referred to as "Adam"), in the above-entitled matter, that all Child

21 Protective Services (CPS) records filed under seal in the above

1 referenced case as well as all drug test results from both parties in the  
2 above referenced case shall be provided to Dr. Paglini, the provider  
3 selected to perform the Child Custody Evaluation.

4 Respectfully Submitted:

Approved as to form and content:

5 THE ABRAMS & MAYO LAW  
6 FIRM

VEGAS WEST ATTORNEYS

7  
8 Vincent Mayo, Esq.  
9 Nevada State Bar Number: 8564  
6252 S. Rainbow Blvd.,  
Suite 100  
10 Las Vegas, Nevada 89118  
11 Tel: (702) 222-4021  
Fax: (702) 248-9750  
Attorney for Plaintiff

  
12 Kristina C. Kirigin, Esq.  
13 Nevada State Bar Number: 9082  
14 5594 South Fort Apache Rd.,  
Suite 120  
15 Las Vegas, Nevada 89148  
16 Tel: (702) 388-1851  
17 Fax: (702) 388-7406  
18 Attorney for Defendant  
19  
20  
21

1 Adam M. Solinger v. Chalese M. Solinger  
2 *Stipulation and Order to Provide CPS Records and*  
3 *Drug Test Results to the Child Custody Evaluator*  
4 Case Number: D-19-582245-D

5 **ORDER**

6 Based upon the stipulation of the parties,

7 **IT IS HEREBY ORDERED** that all Child Protective  
8 Services (CPS) records filed under seal in the above referenced case as  
9 well as all drug test results from both parties in the above referenced  
10 case shall be provided to Dr. Paglini, the provider selected to perform  
11 the Child Custody Evaluation.

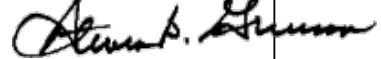
12 Dated this 31 day of March, 2019.

13   
14 DISTRICT COURT JUDGE *kr*

15 Respectfully Submitted:

16 THE ABRAMS & MAYO LAW FIRM

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



1 **NEOJ**

2 Vincent Mayo, Esq.

3 Nevada State Bar Number: 8564

4 **THE ABRAMS & MAYO LAW FIRM**

5 6252 South Rainbow Blvd., Suite 100

6 Las Vegas, Nevada 89118

7 Tel: (702) 222-4021

8 Fax: (702) 248-9750

9 Email: VMGroup@theabramslawfirm.com

10 Attorney for Plaintiff

11 Eighth Judicial District Court

12 Family Division

13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,

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

)

15 Plaintiff,

) Department: I

)

16 vs.

)

)

17 CHALESE MARIE SOLINGER,

)

)

18 Defendant.

)

)

19 **NOTICE OF ENTRY OF STIPULATION AND ORDER TO**  
20 **PROVIDE CPS RECORDS AND DRUG TEST RESULTS TO THE**  
21 **CHILD CUSTODY EVALUATOR**

22 PLEASE TAKE NOTICE that the *Stipulation and Order to Provide*  
23 *CPS Records and Drug Test Results to the Child Custody Evaluator* was  
24 duly entered in the above-referenced matter. A true and correct copy of

///

///



1 said Stipulation and Order is Attached hereto.

2 DATED Tuesday, March 31, 2020.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

5 /s/ Vincent Mayo, Esq.

6 Vincent Mayo, Esq.

7 Nevada State Bar Number: 8564

8 6252 South Rainbow Blvd., Suite 100

9 Las Vegas, Nevada 89118

10 Attorney for Plaintiff

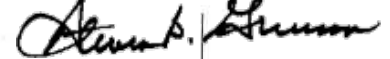
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Entry of Stipulation and Order to Provide CPS Records and Drug Test Results to the Child Custody Evaluator* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Wednesday, April 01, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Kristina Kirigin, Esq.

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



1 **SAO**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: vmgroup@theabramslawfirm.com

Attorney for Plaintiff

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 **STIPULATION AND ORDER TO PROVIDE CPS RECORDS AND**  
15 **DRUG TEST RESULTS TO THE CHILD CUSTODY**  
16 **EVALUATOR**

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18 C. KIRIGIN, ESQ., attorney for Defendant, CHALESE MARIE

19 SOLINGER (hereinafter referred to as "Chalese"), and VINCENT MAYO,

20 ESQ., attorney for Plaintiff, ADAM MICHAEL SOLINGER (hereinafter

referred to as "Adam"), in the above-entitled matter, that all Child

21 Protective Services (CPS) records filed under seal in the above

1 referenced case as well as all drug test results from both parties in the  
2 above referenced case shall be provided to Dr. Paglini, the provider  
3 selected to perform the Child Custody Evaluation.

4 Respectfully Submitted:

Approved as to form and content:

5 THE ABRAMS & MAYO LAW  
6 FIRM

VEGAS WEST ATTORNEYS

7  
8 Vincent Mayo, Esq.  
9 Nevada State Bar Number: 8564  
6252 S. Rainbow Blvd.,  
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Attorney for Plaintiff

  
12 Kristina C. Kirigin, Esq.  
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17 Fax: (702) 388-7406  
18 Attorney for Defendant  
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1 Adam M. Solinger v. Chalese M. Solinger  
2 *Stipulation and Order to Provide CPS Records and*  
3 *Drug Test Results to the Child Custody Evaluator*  
4 Case Number: D-19-582245-D

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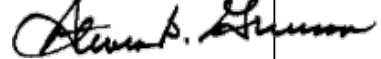
12 Dated this 31 day of March, 2019.

13   
14 DISTRICT COURT JUDGE *kr*

15 Respectfully Submitted:

16 THE ABRAMS & MAYO LAW FIRM

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



1 **OST**

Vincent Mayo, Esq.

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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.

)

12  
13 **ORDER SHORTENING TIME**

14 Plaintiff having moved this Court to shorten the time in which to  
15 hear his *MOTION FOR A CHANGE OF CUSTODY BASED ON*  
16 *DEFENDANT'S ENDANGERMENT OF THE MINOR CHILDREN; FOR*  
17 *MARIE'S BIRTH CERTIFICATE; FOR ATTORNEY'S FEES AND COSTS*  
18 *AND RELATED RELIEF*, and this court, having read the Declaration of  
19 Vincent Mayo, Esq., attorney for Plaintiff, and the pleadings and papers  
20 on file herein, and good cause appearing therefore,

21 *///*

1       **IT IS HEREBY ORDERED** that said hearing is hereby  
2 **SHORTENED** to be set on APRIL 6, 2020, at  
3 9:30AM, in Dept. I of said court. by video conference

4 DATED this 31 day of MARCH, 2020.

5  
6   
DISTRICT COURT JUDGE

7 Respectfully Submitted:

8 THE ABRAMS & MAYO LAW FIRM

9 /s/ Vincent Mayo, Esq.

10 Vincent Mayo, Esq.

Nevada State Bar Number: 8564

11 6252 South Rainbow Blvd., Suite 100

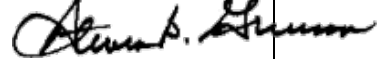
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Attorney for Plaintiff



1 **NEOJ**

2 Vincent Mayo, Esq.

3 Nevada State Bar Number: 8564

4 **THE ABRAMS & MAYO LAW FIRM**

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10 Attorney for Plaintiff

11 Eighth Judicial District Court

12 Family Division

13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,

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

)

15 Plaintiff,

) Department: I

)

16 vs.

)

)

17 CHALESE MARIE SOLINGER,

)

)

18 Defendant.

)

)

19 **NOTICE OF ENTRY OF ORDER SHORTENING TIME**

20 PLEASE TAKE NOTICE that an Order Shortening Time was duly  
21 entered in the above-referenced matter. A true and correct copy of said

22 ///

23 ///

24 ///

///

///



1 Order is attached hereto.

2 DATED Thursday, April 02, 2020.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

5  
6 /s/ Vincent Mayo, Esq.  
7 Vincent Mayo, Esq.  
8 Nevada State Bar Number: 8564  
9 6252 South Rainbow Blvd., Suite 100  
10 Las Vegas, Nevada 89118  
11 Attorney for Plaintiff  
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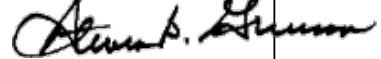
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Entry of Order to Shortening Time* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Thursday, April 02, 2020. Electronic service of the foregoing document as shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Kristina C. Kirigin, Esq.  
Attorney for Defendant

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



1 **OST**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

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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

Family Division

7 Clark County, Nevada

8 ADAM MICHAEL SOLINGER, )

Case No.: D-19-582245-D

9 Plaintiff, )

Department: I

10 vs. )

CHALESE MARIE SOLINGER, )

11 Defendant. )

12 **ORDER SHORTENING TIME**

13  
14 Plaintiff having moved this Court to shorten the time in which to  
15 hear his *MOTION FOR A CHANGE OF CUSTODY BASED ON*  
16 *DEFENDANT'S ENDANGERMENT OF THE MINOR CHILDREN; FOR*  
17 *MARIE'S BIRTH CERTIFICATE; FOR ATTORNEY'S FEES AND COSTS*  
18 *AND RELATED RELIEF*, and this court, having read the Declaration of  
19 Vincent Mayo, Esq., attorney for Plaintiff, and the pleadings and papers  
20 on file herein, and good cause appearing therefore,

21 ///

1       **IT IS HEREBY ORDERED** that said hearing is hereby  
2 **SHORTENED** to be set on APRIL 6, 2020, at  
3 9:30AM, in Dept. I of said court. by video conference

4 DATED this 31 day of MARCH, 2020.

5  
6   
DISTRICT COURT JUDGE

7 Respectfully Submitted:

8 THE ABRAMS & MAYO LAW FIRM

9 /s/ Vincent Mayo, Esq.

10 Vincent Mayo, Esq.

Nevada State Bar Number: 8564

11 6252 South Rainbow Blvd., Suite 100

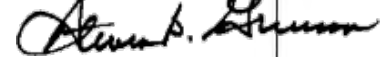
Las Vegas, Nevada 89118

12 Tel: (702) 222-4021

Fax: (702) 248-9750

13 Email: [VMGroup@theabramslawfirm.com](mailto:VMGroup@theabramslawfirm.com)

Attorney for Plaintiff



1 SUB  
2 **Jack W. Fleeman, Esq.**  
3 Nevada Bar No. 010584  
4 **Alicia S. Exley, Esq.**  
5 Nevada Bar No. 14192  
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 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)  
12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)  
13 *Attorneys for Defendant*

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

11 **Adam Michael Solinger,**

12 Plaintiff,

13 vs.

14 **Chalese Marie Solinger,**

15 Defendant.  
16

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

Dept No. **I**

17 SUBSTITUTION OF ATTORNEYS

18 The Defendant, **Chalese Solinger**, hereby substitutes **Jack W. Fleeman,**  
19 **Esq.** and **Alicia S. Exley** of PECOS LAW GROUP, as her attorneys in the above-  
20 entitled action in the place and stead of **Kristina C. Kirigin, Esq** of vegas west  
21 attorneys.

22 DATED this 2 day of April, 2020.

23  
24  
25   
26 **Chalese Solinger**

1       **Jack W. Fleeman, Esq. and Alicia S. Exley, Esq.** of PECOS LAW GROUP,  
2 do hereby agree to be substituted in the place and stead of **Kristina C. Kirigin,**  
3 **Esq. of vegas west attorneys,** as attorney of record for Defendant, **Chalese**  
4 **Solinger,** in the above-entitled action.

5               **DATED** this 2<sup>nd</sup> day of April, 2020.

6                               PECOS LAW GROUP

7  
8  
9                               /s/ Jack Fleeman

10                              **Jack W. Fleeman, Esq.**

Nevada Bar No. 010584

11                              **Alicia S. Exley, Esq.**

Nevada Bar No. 014192

12                              PECOS LAW GROUP

8925 S. Pecos Rd., Suite 14A

13                              Henderson, Nevada 89074

14                              (702) 388-1851

Attorneys for Defendant

15  
16       **Kristina C. Kirigin, Esq.** of vegas west attorneys, does hereby agree to  
17 the substitution of **Jack W. Fleeman, Esq. and Alicia S. Exley, Esq.** of PECOS  
18 LAW GROUP, as attorneys of record in the above-entitled action for Defendant,  
19 **Chalese Solinger.**

20               **DATED** this 2<sup>nd</sup> day of April, 2020.

21                              **vegas west attorneys**

22                              /s/ Holly Fic       Bar # 7699

23                              **Kristina C. Kirigin, Esq.**

Nevada Bar No. 009082

24                              5594 S. Fort Apache Road, Ste. 120

25                              Las Vegas, NV 89148

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**CERTIFICATE OF SERVICE**

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

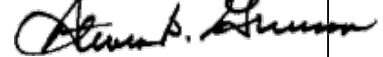
[x] pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system;

To individual(s) listed below at the address:

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
admin email	email@pecoslawgroup.com
Admin Email	email@vegaswestattorneys.com
Alicia Exley	alicia@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Alex Gomez	alex@vegaswestattorneys.com
Kristina Kirigin	kristina@vegaswestattorneys.com
Angela Romero	angela@pecoslawgroup.com

DATED this 2<sup>nd</sup> day of April, 2020.

/s/ Angela Romero  
**Angela Romero,**  
An employee of PECOS LAW GROUP



OPPC  
**Jack W. Fleeman, Esq.**  
Nevada Bar No. 10584  
**Alicia S. Exley, Esq.**  
Nevada Bar No. 14192  
PECOS LAW GROUP  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)  
[Alicia@pecoslawgroup.com](mailto:Alicia@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**

Date of Hearing: **April 6, 2020**

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

**OPPOSITION TO PLAINTIFF’S MOTION FOR A CHANGE OF CUSTODY BASED  
ON DEFENDANT’S ENDANGERMENT OF THE MINOR CHILDREN; FOR  
MARIE’S BIRTH CERTIFICATE; FOR ATTORNEY’S FEES AND COSTS AND  
RELATED RELIEF**  
**AND**  
**COUNTERMOTION FOR AN ORDER TO SHOW CAUSE, COMPENSATORY  
VISITATION TIME, AND ATTORNEY’S FEES**

**COMES NOW** Defendant **Chalese Marie Solinger** (“Chalese”) by and  
through her attorneys, **Jack W. Fleeman, Esq.** and **Alicia S. Exley, Esq.** of



1 PECOS LAW GROUP, and respectfully submits her *Opposition to Plaintiff's Motion*  
2 *for a Change of Custody Based on Defendant's Endangerment of the Minor*  
3 *Children; for Marie's Birth Certificate; for Attorney's Fees and Costs and Related*  
4 *Relief* and respectfully requests that this court enter orders granting her the  
5 following relief:  
6

7 1. Denying Plaintiff's *Motion for a Change of Custody Based on*  
8 *Defendant's Endangerment of the Minor Children; for Marie's Birth Certificate;*  
9 *for Attorney's Fees and Costs and Related Relief;*  
10

11 2. Ordering Plaintiff to show cause why he should not be held in  
12 contempt for unilaterally withholding the minor children;

13 3. Awarding Defendant compensatory visitation time with the children;

14 4. Awarding Defendant her Attorney's Fees; and

15 5. Awarding Defendant such other and further relief as this court deems  
16 just and proper in the premises.  
17

18 . . .

19 . . .

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1 Defendant's opposition and countermotion is made and based upon all the  
2 papers and pleadings on file herein, the attached Points and Authorities, and any  
3 other evidence and argument as may be adduced at the hearing of this matter.  
4

5 DATED this 2<sup>nd</sup> day of April, 2020.

6 PECOS LAW GROUP

7 /s/ Alicia S. Exley, Esq.

8 **Jack W. Fleeman, Esq.**

9 Nevada Bar No. 10584

10 **Alicia S. Exley, Esq.**

11 Nevada Bar No. 14192

12 8925 South Pecos Road, Suite 14A

13 Henderson, Nevada 89074

14 Attorneys for Defendant  
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1 **POINTS AND AUTHORITIES**

2 **I. OPPOSITION TO MOTION**

3 **A. STATEMENT OF FACTS**

4 Plaintiff **Adam Solinger** (“Adam”) has filed numerous motions in this case  
5 to attempt to restrict Defendant **Chalese Solinger’s** (“Chalese’s”) time with the  
6 parties’ minor children, **Michael Adam Solinger** (“Michael”), born June 16,  
7 2015, and **Marie Leona Solinger** (“Marie”), born August 28, 2017.

9 Chalese is aware of the guidelines pertaining to social distancing and notes  
10 that those guidelines have become more strict as time went on. While Adam  
11 complains Chalese had the children at the home of Josh’s parents – who the  
12 children have known now for approximately a year and who are close friends to  
13 Chalese – on March 19<sup>th</sup>. *The following day, March 20, 2020, Adam asked*  
14 *Chalese to drop the children off at a public facility – his girlfriend’s workplace.<sup>1</sup>*  
15 Not only does this go against the Court’s order that Jessica not be present for or  
16 during custodial exchanges, it also shows that Adam’s claim about “everyone in the  
17 house working from home,” if true, was a recent development. Additionally,  
18 Michael and Marie Facetimed Chalese on March 23<sup>rd</sup> and March 24<sup>th</sup> while in  
19 Adam’s care from another public location – the park.  
20

21 The “fight” Adam describes between Chalese and Josh never happened.  
22 Josh was upset when he was served, to be deposed, yet again, but he did not react  
23 in front of the children. Further, Chalese did not have the children in anyone else’s  
24

---

25 <sup>1</sup> See Messages between parties attached as bates label no. (“BS”) DEF01242.

1 house on March 19<sup>th</sup>. Michael was upset that they could not go camping, so  
2 Chalese took the children to spend the night in her trailer so it would be akin to  
3 “camping.” Marie, unfortunately, had an accident that night, so Chalese took the  
4 children home (as opposed to allowing them to sleep in urine-soaked sheets).

5         As for Josh’s friend, Chalese’s stove was malfunctioning, and Josh needed  
6 help switching out her non-working stove with a working one. This was done out  
7 of necessity, as leaving a malfunctioning stove in place could lead to a gas leak.  
8 The friend’s wife and baby came over so Chalese could give them some food and  
9 a few packs of diapers, as they were struggling financially.

11         Chalese has been complying with all government regulations. There have  
12 never been more than 10 people in her home. Everyone has been quarantined the  
13 past couple of weeks. No one was symptomatic. It was not a “party.” It was  
14 Chalese refusing to let a baby go hungry.

16         Josh’s son Jesse was sick a few weeks ago with the mumps. Chalese took  
17 him to the doctor, as Josh was still working, and got him on antibiotics. In an  
18 abundance of caution, Chalese gave Adam a heads-up and had him keep the  
19 children until Jesse finished his course of antibiotics. Adam then told Chalese she  
20 could not have the children back unless Chalese sent Adam a copy of Jesse’s  
21 discharge paperwork. To be clear, Chalese is not one of Jesse’s legal parents, and  
22 what Adam requested was entirely unreasonable, especially given Chalese’s  
23 mature and measured approach to not exposing the children to illness by allowing  
24 Adam to keep them. As has been a constant pattern in this case, every time  
25

1 Chalese attempts to act in the best interest of the children, Adam throws it back in  
2 her face.

3         Regardless, Chalese did send Adam a photo of Jesse's finished medicine  
4 bottle. Adam refused to give Chalese any make-up time with the children.  
5

6         Despite Adam's constant representations that Chalese does not bathe the  
7 children and is "dirty," Chalese has been fully compliant with safety and  
8 sanitation guidelines and has been bleaching and sanitizing the house on a daily  
9 basis. Chalese has told Adam she is doing this. His representation she is not is an  
10 outright lie.

11         Adam also was not honest with the court when he told the Court he was not  
12 going to have Chalese followed by a private investigator anymore. Chalese has had  
13 a car parked outside of her house for over a week with cameras facing towards the  
14 home, and Adam admitted to having someone watch her. Chalese feels that Adam  
15 has been allowed to stalk and harass her without consequence and continues to do  
16 so. Adam has continued to be in contact with Josh's ex-girlfriend as well – the one  
17 who has physically assaulted Chalese, stole from her vehicle, and smashed in her  
18 windshield.  
19

20         Adam references Chalese going to an appointment. It was a necessary  
21 doctor's appointment and, as admitted by Adam, Chalese agreed to Adam picking  
22 up the children. Again, Adam is using a non-issue to try to obtain sole custody of  
23 the children. His actions are offensive.  
24  
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26

1 Finally, Adam constantly interferes with Chalese's phone calls with the  
2 children. Most of the time, these calls are under a minute long and she gets hung  
3 up on by Adam or Jessica. If Chalese does get to talk to the children, they are  
4 often being "bribed" to get off the phone, either with playdates, being at the park,  
5 swimming, watching a moving, or getting a treat. Adam continues to assert his  
6 power in this relationship to make sure Chalese is replaced by Jessica as the  
7 children's other parent.  
8

9 ***This is the second time Adam has illegally and without court permission***  
10 ***withheld the children from Chalese.*** If Adam is not admonished by the court, his  
11 behavior will continue. "Social distancing measures" have been a moving target  
12 for the last three weeks and Chalese has abided by all recommendations. Adam's  
13 motion should be denied, and Chalese should be awarded make-up time with the  
14 children as well as her attorney's fees.  
15

## 16 **B. LEGAL ARGUMENT**

### 17 **1. *There Is No Basis to Award Adam Sole Physical Custody of the Minor*** 18 ***Children.***

19 Adam's *modus operandi* in this case as been as follows: Adam has a private  
20 investigator stalk Chalese and sit outside of her house. He then takes the  
21 information that private investigator sends him – which, based on the deposition  
22 Chalese's counsel did of said private investigator, may not always be the most  
23 accurate information – and makes broad inferences.  
24  
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1 Chalese did not have a “party” on March 27<sup>th</sup>. A friend of Josh’s came in to  
2 fix Chalese’s stove so it did not result in a gas leak. A family also came over to  
3 pick up food and diapers for their baby, which they could not afford to buy.  
4

5 On March 27<sup>th</sup>, Nevada was still under the *Declaration of Emergency*  
6 *Directive 007* issued by Governor Sisolak on March 24, 2020. This directive  
7 stated the “general public shall not gather in groups of ten or more[.]”<sup>2</sup> At no time  
8 did Chalese have ten people in her home. She has not brought the children to  
9 gatherings of more than ten people. She has abided by the Governor’s directive.  
10

11 As for the ice cream truck – or, as Adam calls it, a “veritable plague  
12 wagon”<sup>3</sup> – The Governor’s *Declaration of Emergency Directive 003* allows the  
13 general public to utilize food establishments serving prepared meals.<sup>4</sup> An ice  
14 cream truck does not have “onsite dining,” allows for social distancing, and uses a  
15 very limited number of employees (in most cases, one), limiting the number of  
16 individuals coming into contact with the food. In fact, an ice cream truck would  
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19

---

20 <sup>2</sup> See [http://gov.nv.gov/News/Emergency\\_Orders/2020/2020-03-24 - COVID-  
21 19 Declaration of Emergency Directive 007/](http://gov.nv.gov/News/Emergency_Orders/2020/2020-03-24_-_COVID-19_Declaration_of_Emergency_Directive_007/).

22 <sup>3</sup> There has been a noticeable trend in this case of Adam claiming Chalese and Josh’s  
23 home, hygiene, etc. are “dirty,” which Chalese believes is really Adam claiming he is a “better”  
24 parent than Chalese or Josh because he has more money and a more extravagant lifestyle than  
25 Chalese. The Court should take note of this. There is little difference between getting ice cream  
26 from an ice cream truck and getting it delivered, except for the cost associated with each.

<sup>4</sup> See [http://gov.nv.gov/News/Emergency\\_Orders/2020/2020-03-20 - COVID-  
19 Declaration of Emergency Directive 003/](http://gov.nv.gov/News/Emergency_Orders/2020/2020-03-20_-_COVID-19_Declaration_of_Emergency_Directive_003/).

1 likely have less individuals coming into contact with food than the average  
2 restaurant, and most of the offerings are pre-packaged.

3       The Governor has also clarified that people are allowed to shop for  
4 groceries. Not everyone can afford to have them delivered like Adam, presumably,  
5 can and must still go to the store to purchase food. Chalese and Josh have been  
6 abiding by the guidelines and nothing in those guidelines prohibit getting  
7 groceries.  
8

9       NRS 125C.0045 states the court may modify a child custody order if it is in  
10 the children's best interests. Adam has presented zero evidence that a change in  
11 custody is in the children's best interests. The children have been kept safe,  
12 healthy, and well-cared-for in Chalese's custody.  
13

14       Chalese has *never* been found to have committed "child neglect." Adam has  
15 claimed the children to be in "imminent danger" from Chalese for the last *year*  
16 and yet – lo and behold – the children have not been injured, they have not  
17 suffered any major medical issues, there have been no CPS investigations.  
18

19       Adam cannot continue to be allowed to make unilateral decisions about  
20 when Chalese can and cannot see her children. Chalese never "risked the lives" of  
21 the children. Adam believes that Chalese "responding" to Adam and "working  
22 with" Adam means Chalese doing and saying what Adam wants her to do and say.  
23 He has zero basis for any change in custody and his motion must be denied.  
24

25 . . .  
26





1 EDCR 5.509 sets out the procedure for a motion seeking an order to show cause  
2 and states the movant must file a detailed affidavit in compliance with NRS  
3 22.030(2) and that the motion identify the specific provisions, pages, and lines of  
4 the order that was violated. NRS 22.100 provides that the court may impose a fine  
5 of not more than \$500.00 and/or imprisonment of not more than 25 days on  
6 anyone found guilty of contempt, as well as order that person to pay the other  
7 party's attorney's fees.  
8

9       The *Order after Hearing of June 17, 2019*, filed August 21, 2019, at page 5,  
10 lines 1-4, states as follows:  
11

12       IT IS FURTHER ORDERED that Mother shall have visitation with  
13 the children on an alternating schedule; Wednesdays at 6:00 p.m. until  
14 Friday at 6:00 p.m. and the alternating week Fridays at 6:00 p.m. until  
Sundays at 6:00 p.m.

15       Adam violated this order on April 1<sup>st</sup>, April 2<sup>nd</sup>, and, it is anticipated, April  
16 3<sup>rd</sup> as well. On April 1<sup>st</sup>, Adam refused to allow Chalese to see the children. She  
17 believes he thought he was justified in doing this because he was granted an OST  
18 on his motion. Any allegations of an "emergency" by Adam should fall flat, as he  
19 claims Chalese "endangering" the children began on March 19<sup>th</sup>, but he did not  
20 file a motion until March 31<sup>st</sup> and did not deny Chalese's time again until April 1<sup>st</sup>.  
21 As he has done since being granted primary physical custody, Adam continues to  
22 act as though Chalese has no parental rights whatsoever and that her parenting  
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1 time is at his discretion. It is not and Adam must be held accountable for his  
2 repeated violations of Chalese's equal rights as a parent to these children.

3  
4 **B. CHALESE SHOULD BE AWARDED MAKE-UP TIME WITH THE CHILDREN.**

5 Adam has illegally and without court permission withheld the children from  
6 Chalese. Chalese should have had the children beginning April 1, 2020 but was  
7 denied her time with the children on April 1<sup>st</sup>, April 2<sup>nd</sup>, and she anticipates she  
8 will be denied the children on April 3<sup>rd</sup> as well.

9  
10 NRS 125C.020 allows the court to order additional visits to compensate for  
11 visits of which a parent was wrongfully deprived. The additional visit must be of  
12 the same type and duration of the wrongfully denied time, taken within one year  
13 after the wrongfully denied time, and taken at a time chosen by the parent  
14 deprived of time.

15  
16 Chalese has been wrongfully deprived of a total of at least two days of  
17 parenting time. She should be awarded compensatory time with her children, to  
18 be taken at a time chosen by Chalese, for each and every day she has been denied  
19 time with her children by the time of the hearing.

20  
21 **C. CHALESE SHOULD BE AWARDED HER ATTORNEY'S FEES.**

22  
23 Adam has filed many motions in this case, three of which have been filed  
24 since the court ordered there would be a child custody evaluation done. The court  
25 ordered a child custody evaluation so it could have an expert viewpoint of this

1 case, as opposed to Adam's one-sided accusations. Instead of allowing the custody  
2 evaluator to do their job, Adam keeps filing motions to take Chalese's limited  
3 parenting time away, hold her in contempt, etc.

4  
5 Chalese has spent and had to borrow tens of thousands of dollars to defend  
6 herself from Adam's constant accusations. His behavior has to stop. The instant  
7 motion was totally unnecessary and is a further example of Adam trying to exert  
8 control and flex his financial muscle, making sure Chalese knows he has more  
9 resources available than she does to spend on attorneys. Chalese should be  
10 awarded fees per NRS 18.010, EDCR 7.60, NRS 125.040, NRS 125C.250, and  
11 NRS 22.100.  
12

13 Awards of attorney's fees are within the sound discretion of the district  
14 court. *Fletcher v. Fletcher*, 89 Nev. 540, 516 P.2d 103 (1973); *Levy v. Levy*, 96  
15 Nev. 902, 620 P.2d 860 (1980); *Hybarger v. Hybarger*, 103 Nev. 255, 737 P.2d  
16 889 (1987).  
17

18 When an attorney in a family law case requests fees, the Court must  
19 consider several factors in determining the reasonable value of the services  
20 provided. *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31  
21 (1969). Those factors, referred to as the *Brunzell* factors, are: (1) *The Qualities of*  
22 *the Advocate*: to include ability, training, education, experience, professional  
23 standing and skill; (2) *The Character of the Work to Be Done*: to include the  
24 difficulty importance, time and skill required, the responsibility imposed and the  
25 prominence and character of the parties where they affect the importance of the  
26

1 litigation; (3) *The Work Actually Performed by the Lawyer*: to include the actual  
2 skill, time and attention given to the work; and (4) *The Result Obtained*: whether  
3 the attorney was successful and what benefits were derived. *Id.* The court should  
4 give equal weight to each of the *Brunzell* factors. *Miller v. Wilfong*, 121 Nev. 119  
5 (2005).

6  
7 Further, the Nevada Supreme Court has held that fees and costs may include  
8 non-attorney staff time. *LVMPD v. Yeghiazarian*, 129 Nev. 760, 312 P.3d 503  
9 (2013).

10 1. With regard to the *Qualities of the Advocate*:

11 a. **Jack W. Fleeman, Esq.:** Mr. fleeman is well-qualified and a member  
12 in good standing with the State Bar of Nevada. He has been practicing law  
13 for more than 12 years and primarily in the field of family law. Over this  
14 span of time, Mr. Fleeman has drafted thousands of papers and pleadings,  
15 has participated in hundreds of hearings, and has appeared as lead counsel  
16 in over 30 trials. Mr. Fleeman is a Nevada certified family law specialized  
17 and has briefed and argued several family law cases before the Nevada  
18 Supreme Court, including the recently published caes of *Nguyen v. Boynes*,  
19 133 Nev. Adv. Op. 32, 396 P.3d 774 (2017) and *Miller v. Miller*, 134 Nev.  
20 Adv. Op. 16 (Mar. 15, 2018).

21  
22 b. **Alicia S. Exley, Esq.:** Ms. Exley is well-qualified and a member in  
23 good standing of the State Bar of Nevada. Ms. Exley worked for a family  
24 law attorney for four years prior to graduating from law school, passing the  
25

1 Bar Exam, and being admitted as a Nevada attorney. Ms. Exley has been  
2 practicing primarily in the field of family law for the last three years. She  
3 serves on the Community Service Committee of the Clark County Bar  
4 Association, earning her Committee Circle of Support Awards for 2018 and  
5 2019. She was also named a “Best Up & Coming Attorney” by Nevada  
6 Business Magazine in 2018. Ms. Exley has spoken about QDROs as part of  
7 the Downtown Cultural Series and had an article on economic abuse in  
8 divorce litigation published in the *Nevada Lawyer* in 2019.

9  
10 c. **Angela Romero:** Ms. Romero has been working in the private sector  
11 as a family law paralegal since 2002, and currently holds a Bachelor of  
12 Science in Business Administration. Ms. Romero joined Pecos Law Group  
13 in 2017, and with more than 18 years of family law experience, she  
14 contributed knowledgeable and competent service on this case.

15 2. With regard to the *Character of the Work to Be Done*, this case involved  
16 highly contested issues that took skill particular to family law and ethics.

17  
18 3. With regard to the *Work Actually Performed by the Attorney*, Chalese’s  
19 attorneys were well-prepared for the case. Through the course of this litigation,  
20 Counsel prepared procedurally proper pleadings and prepared for the hearing with  
21 skill, time, and attention.

22  
23 4. With regard to the *Results Obtained*, through application of law to the facts  
24 as set forth in her pleadings and will be introduced at the time of the hearing,  
25 Chalese believes she will prevail on all issues.

1 Counsel will submit applicable billings for the Court's assessment of its  
2 attorney's fees award as the Court directs.

3  
4 **III. CONCLUSION**

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

8 1. Denying Plaintiff's *Motion for a Change of Custody Based on*  
9 *Defendant's Endangerment of the Minor Children; for Marie's Birth Certificate;*  
10 *for Attorney's Fees and Costs and Related Relief;*  
11

12 2. Ordering Plaintiff to show cause why he should not be held in  
13 contempt for unilaterally withholding the minor children;

14 3. Awarding Defendant compensatory visitation time with the children;

15 4. Awarding Defendant her Attorney's Fees; and  
16

17 . . .

18 . . .

19 . . .

20 . . .

21 . . .

22 . . .

23 . . .

24 . . .

25 . . .

26

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

DATED this 2<sup>nd</sup> day of April, 2020.

PECOS LAW GROUP

/s/ Alicia Exley

**Jack W. Fleeman, Esq.**

Nevada Bar No. 10584

**Alicia S. Exley, Esq.**

Nevada Bar No. 14192

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

Attorneys for Defendant



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5. Adam did not obtain my permission or the court's permission to withhold the children during my custodial time on April 1<sup>st</sup>, April 2<sup>nd</sup>, or April 3<sup>rd</sup>.

6. I am requesting an order that Adam show cause as to why he should not be held in contempt for this violation of the court's order.

7. I am also requesting compensatory time with my children for each day of custodial time I have been denied.

8. Finally, I am requesting I be awarded my attorney's fees.

9. I make this declaration under penalty of perjury so that it has the same force and effect as a sworn affidavit pursuant to NRS 53.045. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on April 2, 2020

~~Chalese Marie Solinger~~

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW  
3 GROUP, and that on this 2<sup>nd</sup> day of April, 2020, I served a copy of “OPPOSITION TO  
4 PLAINTIFF’S MOTION FOR A CHANGE OF CUSTODY BASED ON DEFENDANT’S  
5 ENDANGERMENT OF THE MINOR CHILDREN; FOR MARIE’S BIRTH CERTIFICATE; FOR  
6 ATTORNEY’S FEES AND COSTS AND RELATED RELIEF AND COUNTERMOTION FOR AN  
7 ORDER TO SHOW CAUSE, COMPENSATORY VISITATION TIME, AND ATTORNEY’S  
8 FEES” as follows:

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

10 To the individual(s) listed below:

11 Vincent Mayo	VMGroup@TheAbramsLawFirm.com
12 admin email	email@pecoslawgroup.com
13 Alicia Exley	alicia@pecoslawgroup.com
14 Jack Fleeman	jack@pecoslawgroup.com
15 Angela Romero	angela@pecoslawgroup.com

16  
17  
18 /s/ Angela Romero  
19 ANGELA ROMERO,  
20 An employee of PECOS LAW GROUP  
21  
22  
23  
24  
25  
26

3:46



Adam

last seen Mar 31 at 11:05 AM



FRI, MAR 20

1:24 PM ✓

Ok

1:32 PM

Instead of taking them to another home, can you drop them off with Jessica at her work and then she can bring them home to me right now?

1:35 PM

It's about 10 minutes from you.

1:36 PM

I cannot

1:36 PM ✓

Or she's willing to drive to you right now, if need be.

1:36 PM

Fine

1:38 PM ✓

She has to hurry

1:38 PM ✓



Message Adam



DEF001242

002027

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam Michael Solinger,

Plaintiff/Petitioner

v.

Chalese Marie Solinger,

Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

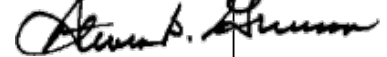
**Step 3.** Add the filing fees from Step 1 and Step 2.

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

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

Party filing Motion/Opposition: Defendant Date 04-02-2020

Signature of Party or Preparer /s/ Angela Romero



**ROPP**

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
Plaintiff,	)	Department: I
vs.	)	
	)	Date of Hearing: April 6, 2020
CHALESE MARIE SOLINGER,	)	Time of Hearing: 9:30 a.m.
	)	
Defendant.	)	

**REPLY IN SUPPORT OF MOTION FOR A CHANGE OF  
CUSTODY BASED ON DEFENDANT'S ENDANGERMENT OF  
THE MINOR CHILDREN; FOR MARIE'S BIRTH  
CERTIFICATE; FOR ATTORNEY'S FEES AND COSTS AND  
RELATED RELIEF AND OPPOSITION TO COUNTERMOTION  
FOR AN ORDER TO SHOW CAUSE, COMPENSATORY  
VISITATION TIME, AND ATTORNEY'S FEES**

**NOW INTO COURT** comes Plaintiff, ADAM MICHAEL  
SOLINGER, by and through his attorney, Vincent Mayo, Esq., of The  
Abrams & Mayo Law Firm, and hereby submits his *REPLY IN SUPPORT  
OF MOTION FOR A CHANGE OF CUSTODY BASED ON  
DEFENDANT'S ENDANGERMENT OF THE MINOR CHILDREN; FOR*

1 *MARIE'S BIRTH CERTIFICATE; ATTORNEY'S FEES AND COSTS AND*  
2 *RELATED RELIEF AND OPPOSITION TO COUNTERMOTION FOR AN*  
3 *ORDER TO SHOW CAUSE, COMPENSATORY VISITATION TIME,*  
4 *AND ATTORNEY'S FEES.*

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

9 Dated Friday, April 03, 2020.

10 Respectfully Submitted,

11 THE ABRAMS & MAYO LAW FIRM

12 /s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

13 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

14 Las Vegas, Nevada 89118

Attorney for Plaintiff

15 **MEMORANDUM OF POINTS AND AUTHORITIES**

16 **I. REPLY**

17 As is Chalese's MO, her Opposition is nothing more than an  
18 attempt to deflect from her own terrible judgement and neglect of the  
19 children's safety and welfare. Chalese starts by stating that she is  
20 "aware" of the guidelines in regard to social distancing, but it is clear this  
21 is a lie and just because she has new counsel claiming she knows, does

1 not make it true. Instead of admitting to her failure to do so, she doubles  
2 down with even more lies.

3 For example, Chalese claims the event on Friday was not a party  
4 but instead consisted of a friend of Josh coming over to help him fix an  
5 issue with a stove. However, this story has a number of holes. First, if the  
6 stove was malfunctioning to the point where it was actively spewing gas,  
7 then they needed to call the fire department, Southwest Gas, or leave the  
8 house, not have some friend come assist. Second, Chalese conveniently  
9 does not mention the second man that was present. Third, it makes no  
10 sense for this friend to bring over his wife and baby when Chalese could  
11 have simply given the friend (male) the food and diapers. Fourth, there  
12 were two men, a woman, a baby, Chalese, Josh, Jesse, Arielle, Michael  
13 and Marie in the home. That makes 10 people – an amount that violates  
14 the order that gatherings of 10 people or more be prohibited. It is telling  
15 that Chalese does not even know the Governor’s order in effect ***as of***  
16 ***March 24<sup>th</sup> was against gatherings of 10 people or more***, not  
17 more than 10 people.<sup>1</sup> Additionally, it appears Chalese is conceding that  
18 yet another person was over at the house because the way her opposition  
19 is written makes it clear that a friend was over to replace the stove and

---

20 <sup>1</sup> [http://gov.nv.gov/News/Emergency\\_Orders/2020/2020-03-24\\_-\\_COVID-19\\_Declaration\\_of\\_Emergency\\_Directive\\_007/](http://gov.nv.gov/News/Emergency_Orders/2020/2020-03-24_-_COVID-19_Declaration_of_Emergency_Directive_007/)  
21



1 that another friend and his wife came over for supplies. So, who knows  
2 how many people have been into that house during this quarantine  
3 period.

4 Worse, and in an effort to rationalize her behavior, Chalese tries to  
5 justify this violation by stating she has known the people who came over  
6 for over a year. Chalese should know that there is not exception to social  
7 distancing based on how well a person knows other people, i.e., the kids  
8 going to Josh's parents house.

9 As for the incident during which Chalese took the children to  
10 Josh's parents' home, this too is another lie in how Chalese describes  
11 these events. Michael was the one who approached Adam and told him  
12 he was scared. When Adam asked why, it was Michael who recited what  
13 occurred at Chalese and Josh's home, including a lady dropping papers  
14 off, how angry Josh became, how they went to Josh's parents' house to  
15 "get away," and that Michael was crying at Josh's parent's home because  
16 he was scared for his father. Adam believes this is because Josh  
17 threatened to hurt Adam in front of the children. Further, Chalese's  
18 trailer story, on the heels of Michael stating what occurred regarding  
19 Josh, is not credible.

20 Co-parenting is key between separated parents and more so in  
21 light of this pandemic. However, Chalese is evasive and all over the place

1 when Adam requests information as to what she has been doing to  
2 protect the children. Chalese either refuses to answer, gives some  
3 generic, unconvincing answer that “she is being careful” or states it is  
4 not Adam’s business. When Adam asks for a quick video walkthrough of  
5 the Chalese’s house—which he is entitled to—she refuses or ignores the  
6 request.<sup>2</sup> The fact Chalese has admitted in AppClose messages that she  
7 does not bathe the children every day makes Adam’s request even more  
8 necessary. Hence, Adam cannot confirm the sanitary condition of  
9 Chalese’s home.

10 Chalese claims everyone in her home is quarantined but this is not  
11 true. Josh works an “essential job” (construction/home improvement),  
12 as does Josh’s father, and is constantly around numerous people and  
13 interacting with the public. Further, Josh taking young children to a full  
14 grocery store and an ice cream truck is also not sticking to protective  
15 protocols.

16 The Court will note that in contrast, Adam has no issue giving  
17 Chalese specifics in regard to what he does. The fact she did not ask just  
18 shows Chalese knows Adam is careful or that she does not care enough  
19 about the issue to ask. Chalese is upset that Adam questions the  
20 cleanliness of her home but what is Adam left to believe when the

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21 <sup>2</sup> Not to mention, how does anything stay sanitary when someone just acquired livestock (chickens) in the middle of a pandemic?

1 Court's order authorizes Adam to verify this for good cause, but Chalese  
2 refuses?

3 Chalese tries to bolster her claim that she is careful by stating she  
4 had Adam hold on to the children for an extra day when Josh found out  
5 that Jesse was sick with a "viral infection in his glands." When asked for  
6 more information given that Jesse was diagnosed with an unknown viral  
7 infection, Chalese provided Adam a prescription for steroids, to help  
8 fight the virus. Steroids do not stop a virus from being transmitted.  
9 Chalese harks on Adam for wanting proof of what Jesse had but with her  
10 history of terrible judgment and neglect of the children's welfare, Adam  
11 cannot be blamed for being extra-careful and not just taking Chalese at  
12 her word.

13 Chalese next attempts to deflect by making unfounded allegations  
14 against Adam. For example, Adam did not ask Chalese to drop the  
15 children off inside Jessica's work office but rather a sparse parking lot (a  
16 parking lot is not a workplace). Jessica was only at the office to grab  
17 some necessary files to continue to work from home. Almost the entirety  
18 of her floor was already working from home. Adam offered this out of  
19 convenience given that Jessica's workplace is very close to Chalese's  
20 house, rather than the children going to yet another house where the  
21 COVID-19 protocols are unknown, and Josh's dad works in construction

1 which is still going strong.

2 Adam did not take the children to the park. Rather, they were on a  
3 walk through in their neighborhood that has a big grassy area. It is not  
4 public and no one else was there at the time Adam and the children  
5 walked through, otherwise Adam would have left.

6 Chalese next tries to change the narrative by claiming Adam  
7 promised not to have a PI on Chalese anymore. Adam never said that.  
8 What he did state is that he has limited funds. If Adam's father is willing  
9 to help out in regard to payment of a PI to ensure that his grandchildren  
10 are safe from harm that is preventable, that is his prerogative. Further,  
11 Adam has constantly stated he would have no issue with being followed  
12 by a PI as he has nothing to hide. It is Chalese who still does.<sup>3</sup> It is also  
13 not stalking or harassing. Paid, trained, and licensed professionals  
14 maintaining a discrete distance to make sure the individuals being  
15 observed are not harassed.

16 Chalese next moves on to the issue of phone calls and makes a  
17 number of lies. Adam's counsel has already directly explained this to  
18 Chalese's counsel<sup>4</sup> but is willing to set the record straight herein. First of  
19 all, Jessica does not and has not interfered with phone calls. The

---

20 <sup>3</sup> As for Carmen, she has an insight into Josh. Adam has asked her if she's heard  
21 certain things or to verify details with her just the same as any parent would.

<sup>4</sup> See the March 27<sup>th</sup> and 30<sup>th</sup> emails between counsel, attached as **Exhibit 2**.

1 children have a short attention span and they don't want to sit in one  
2 place and speak for more than a minute or so. The children will say that  
3 they are done talking to Chalese after they have spoken with her a little  
4 bit. They do the same exact thing to Adam when they are with Chalese  
5 and Adam is talking to them on Facetime. Hence, there is no insidious  
6 scheme. When the children are done talking, they say, "I love you. Bye"  
7 or "I'm done." Adam will then hang up the call.<sup>5</sup> Additionally, Adam has  
8 always offered for Chalese to speak to the children in the morning if she  
9 cannot FaceTime with them at night and he's offered extra FaceTime  
10 opportunities to her during this period of time where she would  
11 normally have them, but for her actions. She has never taken Adam up  
12 on this because she doesn't actually care about FaceTime, she only cares  
13 about herself and trying to prove some arbitrary point.

14 As for Marie's birth certificate, it has come in the mail since.  
15 However, it came too late to take Marie off the private insurance and  
16 enroll her in Adam's new insurance. Because of this, Adam had to pay  
17 over \$1,200 for another month of insurance because Chalese wanted to  
18 play games. It is of note that if Chalese had given the birth certificate

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19 <sup>5</sup> In addition, these past two days, Chalese has refused to not talk to the children  
20 about what is going on and why the children are not with her right now. They have  
21 not asked, and they have no idea that the schedule technically calls for them to be  
with her right now. Because of this, Adam has asked Chalese not to tell them and/or  
talk to them about it and her response is her usual, "I'm their mother and they  
deserve to know why they're not with me."

1 when Adam asked for it, there would have been no issue. Instead, she  
2 appears to have only done so after she re-retained her prior counsel, and  
3 her counsel has yet come up with another excuse on Chalese's behalf.  
4 Chalese chose to withhold the birth certificate out of spite, it wasn't until  
5 she talked to her attorney and was told she was wrong in her actions that  
6 excuses were made.

### 7 **III. OPPOSITION**

8 Chalese references Adam withholding the children but he has  
9 never done so without substantial cause and only when he believed there  
10 was no alternative since Chalese refused to take immediate action. For  
11 example, the first time was when Chalese admitted to being unable to  
12 drive due to medication she was on, barring her from doing so, but her  
13 statement that she would be doing so anyway for a trip to northern  
14 Utah/Idaho. This Court in fact agreed with Adam's action and found his  
15 decision was excused. This case involves the same scenario: Chalese's  
16 refusal to follow the governor's orders and social distancing guidelines  
17 threaten the children's safety by unreasonably increasing the risk of  
18 being exposed to COVID-19, a virus that affects, thousands every day,  
19 old and young alike. What's sad is that these are measures Chalese  
20 concedes per her own motion are necessary. Adam did so only after  
21 Chalese refused to co-parent by being willing to assure Adam of the steps

1 she took to protect them. Adam's actions were therefore in the children's  
2 best interests and warranted temporarily.

3 This is in contrast to the times Chalese has deprived Adam of his  
4 time with the children. Chalese picked up the children from school early,  
5 deprived Adam of after school time with them, just because picking the  
6 children up early was convenient for Chalese (there is literally a  
7 contempt hearing on this issue set for November 7<sup>th</sup>), Chalese withheld  
8 Marie from Adam after Marie's surgery, again for no reason. In February  
9 of 2019, Chalese withheld the children from Adam unless he agreed  
10 never to withhold the children no matter what.

11 Chalese should not be entitled to make-up visitation. This is a  
12 trend for Chalese: Endanger the parties' young children, resulting in  
13 Adam being forced to take steps to protect them, to only complain about  
14 Adam doing so and Chalese losing time, when in fact, this is the cause of  
15 her own careless and reckless actions.

16 Finally, Chalese is not entitled to attorney's fees. Chalese is the one  
17 who placed the children in harm's way, and it was Adam who—once  
18 again—was forced to take action to protect them. Further, Chalese re-  
19 retaining Pecos Law Group is very concerning and appears to have been  
20 done in a scheme to try and obtain additional fees. Pecos Law Group was  
21 awarded \$10,000 in attorney's fees. Vegas West, which is essentially a

1 subsidiary of Pecos Law Group, substitutes in the case and asks for  
2 additional fees. When this Court denied their request, Pecos Law Group  
3 suspiciously substitutes back into the case. Unfortunately, counsel for  
4 Chalese appear to be more concerned about fees than they do actually  
5 exercising client control. By now, they must know there is no exercising  
6 control over Chalese as her actions continue to threaten the children. In  
7 addition, how can Pecos law group substitute back in when it was  
8 necessary to withdraw due to a conflict of interest? Conflicts do not  
9 suddenly disappear. A conflict is a conflict is a conflict. The ethical  
10 impropriety of what is taking place mandates a closer look because it  
11 appears that defense counsels have colluded in an effort to perpetuate a  
12 fraud on this court to obtain additional, unwarranted, legal fees.

### 13 **III. CONCLUSION**

14 Based upon the foregoing, Adam respectfully requests that this  
15 Honorable Court grant the relief requested in this Motion in its entirety,  
16 as well as any further relief the Court deems proper and just.

17 Dated Friday, April 03, 2020.

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



1                   **DECLARATION OF ADAM MICHAEL SOLINGER**

2           I, ADAM MICHAEL SOLINGER, provide this Declaration  
3 pursuant to NRS 53.045 and states the following:

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

7           2.     I make this affidavit in support of the foregoing *REPLY IN*  
8 *SUPPORT OF MOTION FOR A CHANGE OF CUSTODY BASED ON*  
9 *DEFENDANT’S ENDANGERMENT OF THE MINOR CHILDREN; FOR*  
10 *MARIE’S BIRTH CERTIFICATE; ATTORNEY’S FEES AND COSTS AND*  
11 *RELATED RELIEF AND OPPOSITION TO COUNTERMOTION FOR AN*  
12 *ORDER TO SHOW CAUSE, COMPENSATORY VISITATION TIME,*  
13 *AND ATTORNEY’S FEES*

14          3.     I have read said *Reply* and *Opposition* and hereby certify  
15 that the facts set forth in the Points and Authorities attached thereto are  
16 true of my own knowledge, except for those matters therein contained  
17 stated upon information and belief, and as to those matters, I believe  
18 them to be true.

19    ///

20    ///

21    ///

4. I declare under the penalty of perjury pursuant to the laws of the State of Nevada that the foregoing is true and correct.

Dated this 3rd day of April 2020.

/s/ Adam M. Solinger  
ADAM MICHAEL SOLINGER

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *REPLY IN SUPPORT OF MOTION FOR A CHANGE OF CUSTODY BASED ON DEFENDANT’S ENDANGERMENT OF THE MINOR CHILDREN; FOR MARIE’S BIRTH CERTIFICATE; ATTORNEY’S FEES AND COSTS AND RELATED RELIEF AND OPPOSITION TO COUNTERMOTION FOR AN ORDER TO SHOW CAUSE, COMPENSATORY VISITATION TIME, AND ATTORNEY’S FEES* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Friday, April 03, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Jack Fleeman, Esq.  
Attorney for Defendant

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

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

## Vincent Mayo

---

**From:** Vincent Mayo  
**Sent:** Monday, March 30, 2020 8:29 PM  
**To:** Kristina C. Kirigin (kristina@vegaswestattorneys.com)  
**Cc:** Vincent Mayo  
**Subject:** RE: Solinger v. Solinger  
  
**Importance:** High

Kristine,

My client does facilitate calls with Chalese. The problem is that Chalese is either inflexible or unrealistic in regard to working with the schedules of a four and two year old.

For example, Chalese spoke to the children last Tuesday but it was for a minute. This is because the children only wanted to speak for that period of time. The children, being so young, are slow to want to Facetime at all and their attention spans are very short. They are often ready to get off after just two to three minutes, sometimes less (unless there is something to keep their interest). Please know that these calls are also often just as short for Adam. The difference is that Adam does not complain about it and accepts the fact the very young children get bored quickly and are easily distracted during the calls. Chalese, on the other hand, displays poor judgement when she gets mad at the children for it, stating, "Don't get off, talk to mommy," "Don't hang up, you need to talk to mommy," and "Why don't you want to talk to mommy?" Adam can only do so much to keep the children engaged and talking to Chalese and vice versa.

As for last Wednesday, Adam called Chalese at 6:13 p.m. because the children were getting tired, especially Michael, and he thought Chalese speaking to the children early would result in a better conversation for Chalese. The children then fell asleep soon after. Chalese did not call back until 7:00 p.m., by which point the children were asleep.

The same occurred on Thursday. Therefore, Adam called Chalese at 6:51 p.m. Chalese did not answer, choosing instead to wait until precisely 7:00 p.m., at which point the children were falling asleep and having Adam try to get them to engage Chalese would be futile.

Adam showed me the call log showing he tried calling Chalese at those times.

In summary, Adam is not trying to deprive Chalese of her time. Rather, Chalese needs to be more flexible as to times. Adam understands the goal of having a set time but Chalese needs to appreciate calls at that time when dealing with very young children is not always possible. Further, Chalese needs to be realistic in regard to how long the calls with the children are.

On an unrelated matter, Adam is attempting to get Marie on his new insurance, which would be cheaper. However, he needs Marie's birth certificate to do so. Chalese refuses to provide it to him. Therefore, unless Chalese wants to be responsible for the cost of keeping Marie on the old insurance policy, please have her provide Adam the birth certificate.

Sincerely,

Vincent Mayo, Esq.  
Board Certified Family Law Specialist  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
Fax: (702) 248-9750  
[www.TheAbramsLawFirm.com](http://www.TheAbramsLawFirm.com)

**From:** Kristina Kirigin <kristina@vegaswestattorneys.com>  
**Sent:** Friday, March 27, 2020 1:34 PM  
**To:** Vincent Mayo <vmayo@theabramslawfirm.com>  
**Cc:** Email <email@pecoslawgroup.com>  
**Subject:** Solinger v. Solinger

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

Vince,

Can you please speak to your client about allowing/facilitating phone calls with the children? He is making an already difficult time even worse for the children and my client.

Chalese has not spoken to the children since Tuesday, March 24, 2020 and Adam had them end the call at 1 minute. She called yesterday and Wednesday and her calls went unanswered. Adam did not have the children call her back. Clearly, if Adam is complying with staying at home, the children should be available to speak with their mother.

Please talk to Adam, this is clearly a co-parenting issue that needs to be addressed.

Sincerely,

*Kristina Kirigin* | ATTORNEY

vegas west attorneys

5594 SOUTH FORT APACHE ROAD, SUITE 120

LAS VEGAS, NEVADA 89148

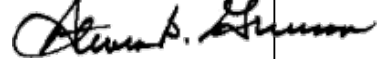
PHONE: (702) 629-7553

FAX: (702) 629-2276

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

This e-mail, and any attachments thereto, is intended only for the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you have received this e-mail in error, please immediately notify me by return e-mail and permanently delete the original and any copy of this e-mail message and any printout thereof.

To ensure compliance with requirements imposed by the U.S. Internal Revenue Service, we inform you that any U.S. tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of avoiding U.S. tax penalties.



1 **EXH**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: VMGroup@theabramslawfirm.com

Attorney for Plaintiff

Eighth Judicial District Court

Family Division

Clark County, Nevada

8 ADAM MICHAEL SOLINGER,

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

)

9 Plaintiff,

) Department: I

)

vs.

)

) Date of Hearing: March 5, 2019

10 CHALESE MARIE SOLINGER,

) Time of Hearing: 3:30 p.m.

)

11 Defendant.

)

12  
13 **APPENDIX OF SUPPLEMENTAL EXHIBITS TO PLAINTIFF'S**  
14 **MOTION FOR A CHANGE OF CUSTODY BASED ON**  
15 **DEFENDANT'S ENDANGERMENT OF THE MINOR**  
16 **CHILDREN; FOR MARIE'S BIRTH CERTIFICATE AND**  
17 **RELATED RELIEF**

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Exhibit	Description
2	Declaration of Emergency Directive 010 Stay at Home Order
3	Photo of Chalese's April 7 <sup>th</sup> camp out
4	April 8, 2020 Elite Investigations Report
5	Extended Order for Protection Against Stalking Aggravated Stalking or Harassment
6	Video of Michael talking about babysitting Marie while Chalese goes into the gas station (Dropbox Link sent via e-mail)

Dated Thursday, April 09, 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 *Appendix of Supplemental Exhibits to Plaintiff's Motion for a Change of Custody Based on Defendant's Endangerment of the Minor Children; For Marie's Birth Certificate; for Attorney's Fees and Costs and Related Relief* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Thursday, April 09, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Jack W. Fleeman, Esq.  
Attorney for Defendant

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

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2



## DECLARATION OF EMERGENCY DIRECTIVE 010 STAY AT HOME ORDER

**WHEREAS**, on March 12, 2020, I, Steve Sisolak, Governor of the State of Nevada issued a Declaration of Emergency to facilitate the State's response to the COVID-19 pandemic; and

**WHEREAS**, on March 13, 2020, Donald J. Trump, President of the United States declared a nationwide emergency pursuant to Sec. 501(6) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (the "Stafford Act"); and

**WHEREAS**, the World Health Organization (WHO) and United States Centers for Disease Control and Prevention (CDC) have advised that there is a correlation between density of persons gathered and the risk of transmission of COVID-19; and

**WHEREAS**, close proximity to other persons is currently contraindicated by public health and medical best practices to combat COVID-19; and

**WHEREAS**, recreational social gatherings unnecessarily extend periods of interpersonal contact and promulgates spread of COVID-19; and

**WHEREAS**, the rate of community spread of COVID-19 can only be reduced by minimizing contact between infected persons and non-infected persons; and

**WHEREAS**, public health experts and epidemiologists indicate that COVID-19 may spread from infected persons to non-infected persons prior to the expression of symptoms in the infected person; and

**WHEREAS**, immediate containment of the spread of COVID-19 is vital to protect the Health and Safety of the Nevada public; and

**WHEREAS**, on March 17, 2020, I directed Nevadans to implement physical distancing measures to minimize opportunities for the disease to spread from infected persons to non-infected persons; and

**WHEREAS**, on March 20, 2020, I issued Directive 003 pursuant to the March 12, 2020 Declaration of Emergency to facilitate the State's response to the COVID-19 pandemic and ordered the closure of all non-essential businesses, and restricted the activities of essential businesses to reduce opportunities for interpersonal contact whereby the novel coronavirus that causes COVID-19 may be spread from infected persons to non-infected persons; and

**WHEREAS**, on March 20, 2020, the Department of Public Safety promulgated emergency regulations defining essential and non-essential businesses, specifically including Essential Healthcare operations and Essential Infrastructure operations;

**WHEREAS**, on March 24, 2020, I issued Directive 007 pursuant to the March 12, 2020 Declaration of Emergency to facilitate the State's response to the COVID-19 pandemic and ordered Nevadans to cease congregating in public spaces; and

**WHEREAS**, on March 29, 2020, Donald J. Trump, President of the United States, recommended the continuation of limitations on gatherings through April 30, 2020, and

**WHEREAS**, as of March 31, 2020, the State of Nevada Department of Health and Human Services is reporting 1,113 positive cases of COVID-19, and 17 deaths resulting from COVID-19; and

**WHEREAS**, the Governor's COVID-19 Medical Advisory Team has advised that Nevada has not yet experienced its peak infection rates of the COVID-19 disease; and

**WHEREAS**, NRS 414.070 outlines additional powers delegated to the Governor during the existence of a state of emergency, including without limitation, enforcing all laws and regulations relating to emergency management and assuming direct operational control of any or all forces, including, without limitation, volunteers and auxiliary staff for emergency management in the State; providing for and compelling the evacuation of all or part of the population from any stricken or threatened area or areas within the State and to take such steps as are necessary for the receipt and care of those persons; and performing and exercising such other functions, powers and duties as are necessary to promote and secure the safety and protection of the civilian population; and

**WHEREAS**, Article 5, Section 1 of the Nevada Constitution provides: "The supreme executive power of this State, shall be vested in a Chief Magistrate who shall be Governor of the State of Nevada;" and

**NOW, THEREFORE**, by the authority vested in me as Governor by the Constitution and the laws of the State of Nevada and the United States, and pursuant to the March 12, 2020, Emergency Declaration,

IT IS HEREBY ORDERED THAT:

SECTION 1:	The March 12, 2020 Declaration of Emergency is hereby extended to April 30, 2020. All Directives promulgated pursuant to this Declaration shall be in force for the duration that the Declaration of Emergency shall be in effect, unless specifically terminated by a subsequent order.
SECTION 2:	With limited exceptions identified below, all Nevadans are ordered to stay in their residences. Gatherings of individuals outside the home is prohibited, subject to the same exceptions.
SECTION 3:	Individuals may leave their residences to provide services, perform work necessary, or obtain services from Essential Healthcare operations (as defined by Section 1 (a) of the March 20, 2020 Emergency Regulations) on behalf of themselves, pets, or those in their household.
SECTION 4:	Individuals may leave their residences to provide services or perform work necessary to the operations of Essential Infrastructure operations (as defined by Section 1 (b) of the March 20, 2020 Emergency Regulations).
SECTION 5:	Individuals may leave their residences to perform work necessary or obtain services or goods necessary from other Essential Licensed Businesses (as defined by Section 1 of the March 20, 2020 Emergency Regulations).
SECTION 6:	This Directive does not prohibit individuals from engaging in outdoor activity, including without limitation, activities such as hiking, walking, or running, so long as the activity complies with all requirements of Emergency Directive 007, participants maintain at least 6 feet distancing from other individuals, and individuals do not congregate in groups beyond their household members.
SECTION 7:	Individuals experiencing homelessness are exempt from this Directive.
SECTION 8:	This Directive shall remain in effect until April 30, 2020, unless renewed by a subsequent Directive promulgated pursuant to the March 12, 2020 Declaration of Emergency to facilitate the State's response to the COVID-19 pandemic.

2020-03-31 Declaration of Emergency Directive 010 Stay at Home




IN WITNESS WHEREOF, I have hereunto set my hand and caused the Great Seal of the State of Nevada to be affixed at the State Capitol in Carson City, this 31st day of March, in the year two thousand twenty.

Governor of the State of Nevada

*Barbara K. Grover*



Secretary of State

  
Deputy Secretary of State

[Executive](#)

[Governor](#)

[Lt. Governor](#)

[Secretary of State](#)

[Attorney General](#)

[State Treasurer](#)

[State Controller](#)

[Legislature](#)

[Legislature Website](#)

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| [ADA Technology Accessibility Guidelines](#) | [Web Style Standards](#) | [ADA Assistance](#) | [State ADA Website](#)

Version 3.0.007

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3



EXHIBIT 4

EXHIBIT 4

EXHIBIT 4





## ELITE INVESTIGATIONS

April 8, 2020

### CONFIDENTIAL INVESTIGATIVE REPORT

---

Subject: Chalese Solinger  
Our File No.: LV190387  
  
Prepared for: Adam Solinger

---

**THIS REPORT HAS BEEN PREPARED BY ELITE INVESTIGATIONS AND IS  
FURNISHED AS A CONFIDENTIAL COMMUNICATION SOLELY TO THE  
ADDRESSEE ONLY.**

CORPORATE CORRESPONDENCE  
7435 S. EASTERN AVENUE, #5-284  
LAS VEGAS, NV 89123

TOLL FREE TEL. 866 463 5483  
DIRECT 702 897 8473  
US FAX 702 270 8650

NEVADA PI LICENSE # 873

E-MAIL: [jong@eliteinvestigations.com](mailto:jong@eliteinvestigations.com)

*Worldwide Investigate Services*

002056

# SURVEILLANCE INVESTIGATIVE REPORT

April 8, 2020

## CLIENT INFORMATION:

Client: Adam Solinger  
Subject: Chalese Solinger

## OUR INFORMATION:

File No: LV190387  
Investigators: C. Doyal, J. Schneider, T. LaFronz, R. Guill, E. Hernandez  
Dates of Investigation: 3.24.20, 3.25.20, 3.27.20, 3.28.20, 3.29.20, 4.3.20 & 4.4.20

## TABLE OF CONTENTS:

I	Subject
II	Additional Investigative Inquiries
III	Assignment
IV	Investigative Timeline
V	Status of Investigation
VI	Exhibits
VII	Enclosures

CORPORATE CORRESPONDENCE  
7435 S. EASTERN AVENUE, #5-284  
LAS VEGAS, NV 89123

TOLL FREE TEL. 866 463 5483  
DIRECT 702 897 8473  
US FAX 702 270 8650

NEVADA PI LICENSE # 873

E-MAIL [jong@eliteinvestigations.com](mailto:jong@eliteinvestigations.com)

## **I. SUBJECT:**

Name: Chalese Solinger  
Location: 4657 Curdsen Way  
Las Vegas, Nevada 89110

## **II. ADDITIONAL INVESTIGATIVE INQUIRIES:**

N/A

## **III. ASSIGNMENT:**

This will serve to transmit our investigative report in connection with the sub rosa investigation that was completed upon Chalese Solinger.

## **IV. INVESTIGATIVE TIMELINE:**

**Tuesday, March 24, 2020**

- 10:32 AM Our investigator departed for his destination.
- 11:04 AM The investigator arrived at Ms. Solinger's residence:  
  
4657 Curdsen Way  
Las Vegas, Nevada 89110
- The silver GMC Sierra was parked on the driveway. The red GMC Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with Ms. Solinger. A surveillance position with a view of the residence was established. **(VIDEO OBTAINED)**
- 3:23 PM Mr. Lloyd arrived in the Ford F-150. He exited the vehicle entered the residence. **(VIDEO OBTAINED)**
- 3:31 PM Mr. Lloyd's son exited the residence alone, retrieved a pizza from the Ford F-150, and entered the residence. He exited alone, retrieved a second pizza, and entered the residence. He exited the residence alone, checked a mailbox, and entered the residence. **(VIDEO OBTAINED)**
- 6:15 PM No activity was observed that was thought to be associated with Ms. Solinger. Pursuant to the Client's instruction, surveillance was terminated, and the investigator departed for his destination.

6:34 PM The investigator arrived at his base of operations to document the day's investigative activities.

*Approximately 2 minutes video was obtained on this date*

**Wednesday, March 25, 2020**

7:35 AM Our investigator departed for his destination.

7:58 AM The investigator arrived at Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The silver GMC Sierra was parked on the driveway. The red GMC Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. Two garbage cans were curbside in front of the residence. No activity was observed that was thought to be associated with the Subjects. A surveillance position with a view of the residence was established. **(VIDEO OBTAINED)**

8:13 AM Ms. Solinger exited the residence and placed items in a garbage can. She retrieved two additional garbage cans and placed them curbside. She entered the residence. **(VIDEO OBTAINED)**

10:58 AM Ms. Solinger and the Mr. Lloyd's son departed in the silver GMC Sierra. **(VIDEO OBTAINED)**

11:01 AM They arrived at Jack in the Box:

**1610 North Lamb Boulevard  
Las Vegas, Nevada 89115**

The utilized the drive-thru and departed the area. **(VIDEO OBTAINED)**

11:08 AM They returned to their residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

Ms. Solinger and Mr. Lloyd's son exited the vehicle and entered the residence. **(VIDEO OBTAINED)**

Pursuant to the Client's instruction, the investigator departed for the residence of Mr. Lloyd's parents.

11:45 AM The investigator arrived at the residence of Mr. Lloyd's parents:  
  
**2256 Grand Clover Lane  
Las Vegas, Nevada 89156**  
  
Mr. Lloyd's vehicle was not located. The investigator departed for his destination.

12:20 PM The investigator arrived at Mr. Lloyd's place of employment, One Stop 4 Flooring:  
  
**6150 West Flamingo Road  
Las Vegas, Nevada 89103**  
  
Mr. Lloyd's Ford F-150 was located in the parking lot. No activity as observed that was thought to be associated with Mr. Lloyd. A surveillance position with a view of the vehicle was established. (VIDEO OBTAINED)

1:23 PM No activity was observed that was thought to be associated with Mr. Lloyd. Pursuant to the Client's instruction, the investigator departed for his destination.

1:48 PM The investigator arrived at Ms. Solinger's residence:  
  
**4657 Curdsen Way  
Las Vegas, Nevada 89110**  
  
The silver GMC Sierra was parked on the driveway. The red GMC Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with the Subjects. A surveillance position with a view of the residence was established. (VIDEO OBTAINED)

3:05 PM No activity was observed. Due to the lack of activity, surveillance was terminated, and the investigator departed for his destination.

3:27 PM The investigator arrived at his base of operations to document the day's investigative activities.

*Approximately 1 minute video was obtained of on this date*

**Friday, March 27, 2020**

7:12 PM Our investigator departed for his destination.

7:24 PM The investigator arrived at Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The white Ford F-150 pickup truck was parked on the left side of the residence. The silver GMC Sierra and a dark colored Dodge Charger bearing paper license plates, were parked on the driveway. The red GMC Sierra was parked curbside in front of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with Ms. Solinger. A surveillance position with a view of the residence and vehicles was established. **(VIDEO OBTAINED)**

8:34 PM A woman exited the residence, placed an item in the trunk of the Dodge Charger, and returned to the residence. **(VIDEO OBTAINED)**

8:39 PM The woman, two men, a dog, and an infant entered the Dodge Charger and departed. **(VIDEO OBTAINED)**

8:43 PM They traveled south on north Lamb Boulevard, out of view, as the investigator became detained by a slower moving vehicle. A search was conducted to locate the vehicle.

8:45 PM The vehicle was not located. Pursuant to the Client's instruction, surveillance was terminated, and the investigator departed for his destination.

9:15 PM The investigator arrived at his base of operations to document the day's investigative activities.

*No video was obtained of Ms. Solinger on this date*

**Saturday, March 28, 2020**

6:40 AM Our investigator departed for his destination.

7:08 AM The investigator arrived at Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The silver GMC Sierra was parked on the driveway. The Ford F150 was parked alongside the residence on the front lawn. The red GMC Sierra was parked curbside in front of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No

activity was observed that was thought to be associated with Ms. Solinger. A surveillance position with a view of the residence was established. **(VIDEO OBTAINED)**

9:09 AM-  
9:44 AM Mr. Lloyd departed in the red GMC Sierra with his son, traveled to Lowes Home Improvement, and back to the residence.

10:10 AM The garage door opened automatically. Ms. Solinger exited the residence, walked over to the trash bins, placed several items inside, and returned to the residence.

3:30 PM A woman arrived in a white Nissan Altima and parked curbside in front of the residence. She was approximately 5'4" tall, weighing approximately 200 pounds. She carried a case of bottled water toward the left side of the residence, out of view. She was approached by Mr. Lloyd's son. She retrieved a second case of water from the vehicle and walked out of view on the left side of the residence. **(VIDEO OBTAINED)**

3:40 PM The woman returned to the vehicle and departed. **(VIDEO OBTAINED)**

4:01 PM Mr. Lloyd walked into view and put a roll of chain-link fence in the bed of the red pickup truck. His son stepped into the side yard. Mr. Lloyd retrieved yard tools from the bed of the white pickup truck and carried them to the left side of the residence, out of view. **(VIDEO OBTAINED)**

4:55 PM Mr. Lloyd pulled a garbage bin around the driveway and out of view on the left side of the residence. **(VIDEO OBTAINED)**

5:33 PM Ms. Solinger exited the residence, checked the mailbox, and returned to the residence. **(VIDEO OBTAINED)**

8:04 PM No activity was observed that was thought to be associated with Ms. Solinger. Due to the lack of activity, surveillance was terminated, and the investigator departed for his destination.

8:37 PM The investigator arrived at his base of operations to document the day's investigative activities.

*Approximately 4 minutes of video was obtained on this date*

**Sunday, March 29, 2020**

8:30 AM Our investigator departed for his destination.

8:58 AM The investigator arrived at Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The silver GMC Sierra and Ford F-150 were parked on the driveway. The red GMC Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with the Subjects. A surveillance position with a view of the residence was established.  
**(VIDEO OBTAINED)**

1:10 PM Mr. Lloyd departed in the red GMC Sierra.

1:14 PM Ms. Solinger exited the residence, placed an item near the house, and entered.

1:49 PM Mr. Lloyd returned in the GMC Sierra. He exited the vehicle and walked to an ice cream truck. He purchased a beverage and ice cream and entered the residence.

3:54 PM Mr. Lloyd departed with his son and daughter in the Ford F-150.

4:31 PM Ms. Solinger exited the residence, placed an item in a garbage can, and entered the residence.

4:43 PM Mr. Lloyd returned with his son in the Ford F-150. They retrieved groceries from the vehicle and entered the residence.

5:34 PM Ms. Solinger exited the residence, placed an item in a garbage can, and entered the residence.

5:59 PM The Client picked up his son and daughter and departed the area.

6:01 PM Pursuant to the Client's instruction, surveillance was terminated, and the investigator departed for his destination.

6:24 PM The investigator arrived at his base of operations to document the day's investigative activities.

*Approximately 6 minutes video was obtained on this date*

**Friday, April 3, 2020**

3:40 PM Our investigator departed for his destination.



3:58 PM The investigator arrived at Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The silver GMC Sierra and Ford F-150 were parked on the driveway. The red GMC Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with Ms. Solinger. A surveillance position with a view of the residence was established. **(VIDEO OBTAINED)**

4:01 PM A woman arrived in a burgundy Jeep Liberty, bearing Nevada license plate number 305E10, and picked up Mr. Lloyd's son. **(VIDEO OBTAINED)**

4:49 PM Ms. Solinger exited the residence, retrieved mail, and entered the residence. **(VIDEO OBTAINED)**

5:57 PM Ms. Solinger and Mr. Lloyd exited the residence, inspected the side of the residence, and entered. **(VIDEO OBTAINED)**

6:45 PM The previously observed woman returned in the Jeep Liberty and dropped off Mr. Lloyd's son. **(VIDEO OBTAINED)**

6:55 PM Mr. Lloyd's son exited the residence alone, checked a mailbox, and entered the residence. **(VIDEO OBTAINED)**

7:47 PM A woman arrived in a white Nissan Altima, bearing Nevada license plate number PK2021. Mr. Lloyd and his son exited the residence and assisted the woman with retrieving items from the vehicle. They entered the residence. **(VIDEO OBTAINED)**

7:59 PM Mr. Lloyd's son exited the residence alone on two occasions and placed items in a garbage can. **(VIDEO OBTAINED)**

8:06 PM The previously observed woman departed in the Nissan Altima. Due to brief visual of this activity, no video was obtained. Mobile surveillance was initiated.

8:19 PM While stopped at a traffic signal, the investigator obtained an identification shot of the woman and departed for his destination. **(VIDEO OBTAINED)**

8:28 PM The investigator arrived at Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The silver GMC Sierra and Ford F-150 were parked on the driveway. The red GMC

Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with the Subjects. A surveillance position with a view of the residence was established.

9:00 PM No activity was observed that was thought to be associated with Ms. Solinger. Due to the lack of activity, surveillance was terminated, and the investigator departed for his destination.

9:16 PM The investigator arrived at his base of operations to document the day's investigative activities.

*Approximately 7 minutes video was obtained on this date*

**Saturday, April 4, 2020**

10:38 AM Our investigator departed for his destination.

11:00 AM The investigator arrived at Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The silver GMC Sierra and Ford F-150 were parked on the driveway. The red GMC Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. Two garbage cans were curbside in front of the residence. No activity was observed that was thought to be associated with Ms. Solinger. A surveillance position with a view of the residence was established. **(VIDEO OBTAINED)**

12:07 PM Ms. Solinger, Mr. Lloyd, and his son exited the residence. They entered the silver GMC Sierra and departed the area. **(VIDEO OBTAINED)**

12:14 PM They traveled north on North Hollywood Boulevard, out of view, as the investigator became detained by traffic. As traffic conditions permitted, a search of the area was conducted to locate them.

12:22 PM Ms. Solinger and her companions were located at Chevron gas station:

**6680 East Lake Mead Boulevard  
Las Vegas, Nevada 89156**

They exited the parking lot and departed the area.

12:33 PM They traveled on Pabco Road, out of view, as the investigator became detained by slower moving vehicles. As traffic conditions permitted, a search of the area, including several hiking trails and dirt roads was conducted to locate them.

1:05 PM Ms. Solinger was not located. The investigator departed for his destination.

1:31 PM The investigator returned to Ms. Solinger's residence:

**4657 Curdsen Way  
Las Vegas, Nevada 89110**

The Ford F-150 pickup truck was parked on the driveway. The red GMC Sierra was parked near the side of the residence. All visible windows and doors to the residence were closed, which prevented the investigator from viewing the interior. No activity was observed that was thought to be associated with Ms. Solinger. A surveillance position with a view of the residence was established. **(VIDEO OBTAINED)**

2:05 PM Ms. Solinger, Mr. Lloyd, and his son arrived and parked on the driveway. Ms. Solinger and Mr. Lloyd exited the vehicle with fast food beverages and entered the residence. Mr. Lloyd's son exited the vehicle with the fast food trash in one hand and flowers in the other. He placed the trash in one of the cans at the curb and entered the residence. **(VIDEO OBTAINED)**

4:47 PM A FedEx truck stopped curbside in front of the residence. The driver exited the vehicle, retrieved a box from the rear of the truck, and carried it to the front door. He returned to the truck without the box and departed the area.

5:55 PM An unidentified man and woman with several dogs arrived in a brown Chevrolet Suburban and stopped curbside in front of the residence. Mr. Lloyd's son exited the residence and walked to the driver's side of the vehicle. Mr. Lloyd exited the residence and stood in the yard while conversing with the couple. His son entered and exited the residence. Mr. Lloyd and his son returned to the residence and the man and woman departed the area. **(VIDEO OBTAINED)**

6:16 PM Mr. Lloyd's son was observed on a fence in the backyard.

9:00 PM No activity was observed that was thought to be associated with Ms. Solinger. Due to the lack of activity, surveillance was terminated, and the investigator departed for his destination.

9:18 PM The investigator arrived at his base of operations to document the day's investigative activities.

*Approximately 6 minutes of video was obtained on this date*

*Video Evidence - The images will include the date and time of the activity as it is being recorded and the preceding notes are indexed to these recording times. The approximate elapsed time of videorecording obtained is listed at the end of the notes for each day. An original videorecording will be secured at the offices of Elite Investigations for a period of five years, or until instruction for its disposition is received*

## **V. STATUS OF INVESTIGATION:**

This investigation is ongoing. Should you have any questions or comments, please contact our corporate office at 702-897-8473.

Thank you for this assignment.



Estevan Hernandez  
Investigator  
Elite Investigations

EH/gr

## **VI. EXHIBITS:**

None

## **VII. ENCLOSURES:**

1. None

Elite Investigations' Investigators make every effort to positively identify the SUBJECT without compromising the confidential nature of the investigation. We certify that the surveillance videorecording and report are a true and accurate representation of the details of this investigation. Notwithstanding Elite Investigations' best efforts, there may be occasions where someone other than the intended SUBJECT is videorecorded. It is important, therefore, that you review any videorecording footage obtained to insure that the individual depicted is in fact the intended SUBJECT. In the event that Elite Investigations inadvertently secures a videorecording of the incorrect person, its liability is limited to having the case reworked by Elite Investigations at no further expense to you, or to refunding the paid invoice for the service.

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5

Case No. 19PO1992

JC DEPARTMENT 14

IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP  
COUNTY OF CLARK, STATE OF NEVADA

Adam M Solinger, Applicant  
vs.  
Joshua Lloyd, Adverse Party(s)

)  
)  
) **EXTENDED ORDER FOR**  
) **PROTECTION AGAINST STALKING,**  
) **AGGRAVATED STALKING OR**  
) **HARASSMENT (NRS 200.591)**  
)  
) **Date Issued: 04/09/2020**  
) **Expiration Date: 04/09/2021**  
)  
)  
)

**YOU, THE ADVERSE PARTY, ARE HEREBY NOTIFIED** that ANY INTENTIONAL VIOLATION OF THIS ORDER IS A CRIMINAL VIOLATION and can result in your immediate arrest or issuance of an arrest warrant. Unless a more severe penalty is prescribed by law for the act that constitutes the violation of the Order, a violation of an Extended Order for Protection Against Stalking, Aggravated Stalking or Harassment is a category C felony which is punishable by imprisonment in the state prison for not more than five (5) years, and a fine of not more than \$10,000.00.

**PURSUANT TO NRS 193.166**, if the act that constitutes the violation of a protection order is itself a felony, the violator shall, in addition to the term of imprisonment prescribed by statute for the crime, be punished by imprisonment in the state prison for a minimum term of not less than 1 year and a maximum term of not more than 20 years.

**YOU ARE FURTHER NOTIFIED** that you **CAN BE ARRESTED** even if the person who obtained the Order invites or allows you to contact them. You have the *sole responsibility* to avoid or refrain from violating the terms of this Order. Only the Court can change the Order upon written application.

**WARNING: Possession of a firearm or ammunition while this Order is in effect may constitute a felony under federal law punishable by a fine of up to \$250,000 and/or a prison sentence of up to ten (10) years.**

This Order may meet the Full Faith and Credit provisions of the Violence Against Women Act and may be enforceable in all 50 states, the District of Columbia, U.S. Territories and Indian Nations. All other Courts and law enforcement with jurisdiction within the United States and all Indian Nations may give full faith and credit to this Order pursuant to 18 U.S.C. Sec. 2265.

Violation of the Order may subject you to federal charges and punishment pursuant to 18 U.S.C. Sec. 2261(a)(1) and (2) and 2262(a)(1) and (2).

1 The Court having considered the filings, testimony (if applicable) and evidence  
2 presented at hearing, and the Court having found that the Adverse Party received notice of  
3 hearing at which such person had an opportunity to participate, and the:

4 **Adverse Party:**

☐ **was present**

☒ was not present

☐ was represented by counsel, \_\_\_\_

7 **Applicant(s)**

☒ **was present**

☐ was not present

☐ was represented by counsel, \_\_\_\_

10 and the Court having proper jurisdiction over the parties and the subject matter, and good  
11 cause appearing:

12 **YOU ARE HEREBY ORDERED** as follows: TO STAY 100 FEET AWAY FROM  
13 WHEREVER THE APPLICANT(S) IS FOUND.

14 **YOU ARE PROHIBITED**, either directly or indirectly, or through an agent or other  
15 person, from contacting, intimidating, threatening or otherwise interfering with the Applicant  
16 **(Adam M Solinger)** and/or the following persons: Jessica Sellers, Courtney Sellers including,  
17 but not limited to, in person, by telephone, through the mail, through electronic mail (e-mail),  
18 text messaging, or facsimile (fax).

19 1. **YOU ARE ORDERED** to stay away from the following places:

20 ☒ Residence(s): CONFIDENTIAL

21 ☒ Place(s) of Employment (Name & Address): CONFIDENTIAL

22 ☒ School(s) (Name & Address): CONFIDENTIAL

23 ☐ Other Locations Frequented (Name & Address):

2. **OTHER CONDITIONS:**

3. **YOU ARE FURTHER ORDERED**

☐ (a) To pay all previously deferred costs and official fees in the amount of

\$ payable to by . (date)

☐ (b) To pay deferred costs and official fees in the reduced amount of

\$ payable to by . (date)

☐ (c) Deferred costs and official fees are waived in the interest of justice.

4. **THIS ORDER WILL REMAIN IN EFFECT UNTIL 11:59 P.M.  
ON THE DATE SET FORTH ON PAGE 1 UNLESS THE COURT  
ORDERS OTHERWISE.**

5. **IT IS FURTHER ORDERED** that the Clerk of the Court shall  
transmit a copy of this Order together with the Application, to the Clark  
County Sheriff's Office and/or any other appropriate law enforcement  
agency to attempt service on the Adverse Party(s).

6. **IT IS FURTHER ORDERED** that said law enforcement agency  
must promptly attempt to serve this Order upon the Adverse Party, without  
charge to the Applicant, and upon service file a return of service with the  
Court by the end of the next business day after service is made.



1  
2 **NOTICE TO LAW ENFORCEMENT**

3 Any law enforcement officer, with or without a warrant, may arrest and take  
4 into custody the Adverse Party, when the law enforcement officer has probable cause  
5 to believe that;

6 (a) an order has been issued pursuant to NRS 200.591 against the Adverse  
7 Party; (b) the Adverse Party has been served with a copy of the order; and  
8 (c) the Adverse Party is acting or has acted in violation of the order. This  
9 arrest may occur regardless of whether the violation occurred in the officer's  
10 presence.

11 Any law enforcement agency in this state may enforce a court order issued  
12 pursuant to NRS 200.591, without regard to the county in which the order is issued.

13  
14 IT IS SO ORDERED this 9<sup>th</sup> day of April 20 20

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18 JUDGE AMY CHELINI  
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**PROOF OF SERVICE UPON ADVERSE PARTY**

I, the undersigned, personally served the Adverse Party above named with a copy of this Extended Order for Protection Against Stalking, Aggravated Stalking or Harassment on the date set forth below.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date of Service

\_\_\_\_\_  
Time of Service

Applicant: **Adam M Solinger**

Adverse Party: **Joshua Lloyd**

Case No.: **19PO1992**

**Extended Order for Protection Against Stalking,  
Aggravated Stalking, or Harassment  
State of Nevada NRS 200.591**

Case No. 19PO1992

JC DEPARTMENT 14

Las Vegas Justice Court

County of Clark, State of Nevada

**APPLICANT**

**ADAM M SOLINGER**

*And/or on behalf of the following person(s) (list name(s) and age(s)):*

Jessica Sellers  
Courtney Sellers

36  
16

Name(s)

Age(s)

VS.

**ADVERSE PARTY**

**JOSHUA LLOYD**

Adverse Party's Address and Phone Number:

4657 CURDSEN WAY  
LAS VEGAS NV 89156

<b>SEX</b> MALE	<b>RACE</b> WHITE	<b>DOB</b> 09/27/1991	<b>HT</b> 5 Ft. 7 In.	<b>WT</b> 180 Lbs.
<b>EYES</b>	<b>HAIR</b> BROWN	<b>DISTINGUISHING FEATURES</b>		
<b>ADVERSE PARTY VEHICLE INFORMATION</b>				

**CAUTION:** ☐ **ACCESS TO WEAPONS**  
☒ **OTHER:**  
May react violently when served

**THE COURT HEREBY FINDS:**

*That it has jurisdiction over the parties and subject matter, and the Adverse Party received actual notice of hearing at which such person had an opportunity to participate and be heard.*

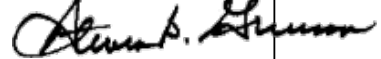
**THE COURT HEREBY ORDERS:**

*That the Adverse Party be prohibited from committing further unlawful acts. Additional terms of this order are as set forth on the following pages.*

**The terms of this order shall expire:**

☒ At 11:59 p.m. on 04/09/2021 unless otherwise ordered by the Court.  
(MONTH) (DAY) (YEAR)

*This Order may meet the Full Faith and Credit provisions of the Violence Against Women Act and may be enforceable in all 50 states, the District of Columbia, U.S. Territories and Indian Nations. All other courts and law enforcement with jurisdiction within the United States and all Indian Nations may give full faith and credit to this Order pursuant to 18 U.S.C. Sec. 2265. Violation of the Order may subject you to federal charges and punishment pursuant to 18 U.S.C. Sec. 2261(a)(1) and (2) and 2262(a)(1) and (2).*



**ORDR**

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
Plaintiff,	)	Department: I
vs.	)	
	)	Date of Hearing: April 6, 2020
CHALESE MARIE SOLINGER,	)	Time of Hearing: 9:30 a.m.
	)	
Defendant.	)	

**ORDER AFTER HEARING OF APRIL 6, 2020**

This matter coming on for hearing on the on the 6<sup>th</sup> day of April 2020, before the Honorable Cheryl B. Moss, upon Plaintiff's *Motion for Change of Custody Based on Defendant's Endangerment of the Minor Children, for Marie's Birth Certificate, for Attorney's Fees and Costs and Related Relief* and Defendant's *Opposition and Countermotion for an Order to Show Cause, Compensatory Visitation Time and Attorney's Fees* and Plaintiff's *Reply in Support and Opposition to Countermotion* with Plaintiff, ADAM MICHAEL SOLINGER (hereinafter referred to as

1 "Adam"), having appeared by and through his attorney of record,  
2 VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM, and  
3 Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as  
4 "Chalese"), having appeared by and through her attorney of record,  
5 JACK FLEEMAN, ESQ., of PECOS LAW GROUP. Court having listened  
6 to the representations and arguments of counsel, and good cause  
7 appearing:

8 **THIS COURT HEREBY NOTES** that all Parties appeared by  
9 video.

10 **THIS COURT FURTHER NOTES** that discussion regarding  
11 whether Defendant's counsel having a conflict of interest to represent  
12 Defendant. Upon Court's inquiry, Defendant has confirmed she has  
13 rehired the Pecos Law Group.

14 **THIS COURT FURTHER NOTES** that the department of  
15 Family Services closed their investigation.

16 **THIS COURT FURTHER NOTES** that there are monitoring  
17 problems and credibility issues to be addressed at the return hearing.

18 **THIS COURT HEREBY FINDS** that based on the  
19 representations of Defendant and her counsel, there is no conflict of  
20 interest related to Defendant rehiring The Pecos Law Group.

21 ///

1       Therefore, and for good cause showing,

2       **IT IS HEREBY ORDERED** that based on Plaintiff's allegations,  
3 the current COVID-19 crisis, and an abundance of caution, Plaintiff has  
4 temporary sole legal and sole physical custody of the children until April  
5 13, 2020 at 9:45 a.m.

6       **IT IS FURTHER ORDERED** that Defendant's request for  
7 compensatory visitation is deferred.

8       **IT IS FURTHER ORDERED** that Department I shall send both  
9 Counsel a copy of the CPS records.

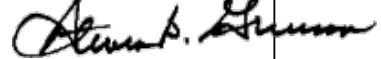
10       **IT IS FURTHER ORDERED** that any videos Plaintiff intended  
11 to show today shall be produced immediately to opposing counsel and  
12 the Court. Any other documentation related to this issue shall be  
13 disclosed to Defendant and this Court no later than 12:00 p.m. on  
14 Thursday, April 9, 2020. The Court shall review same prior to the return  
15 hearing issue is deferred until the return hearing, currently set for  
16 Monday, April 13, 2020.

17       **IT IS FURTHER ORDERED** that hearing set for April 7, 2020  
18 at 9:30 a.m. is vacated and reset to April 13, 2020 at 9:45 a.m.

19       **IT IS FURTHER ORDERED** that this matter shall be continued  
20 to the hearing set for April 13, 2020, at 9:45 a.m.

21       ///





1 **NEOJ**

2 Vincent Mayo, Esq.

3 Nevada State Bar Number: 8564

4 **THE ABRAMS & MAYO LAW FIRM**

5 6252 South Rainbow Blvd., Suite 100

6 Las Vegas, Nevada 89118

7 Tel: (702) 222-4021

8 Fax: (702) 248-9750

9 Email: VMGroup@theabramslawfirm.com

10 Attorney for Plaintiff

11 Eighth Judicial District Court

12 Family Division

13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER,

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

)

15 Plaintiff,

) Department: I

)

16 vs.

)

)

17 CHALESE MARIE SOLINGER,

)

)

18 Defendant.

)

)

19 **NOTICE OF ENTRY OF ORDER AFTER HEARING OF**

20 **APRIL 6, 2020**

21 PLEASE TAKE NOTICE that the Order After Hearing of April 6,  
22 2020 was duly entered in the above-referenced matter. A true and correct  
23 copy of said

24 ///

///

///



1 Order is attached hereto.

2 DATED Wednesday, April 22, 2020.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

5 /s/ Vincent Mayo, Esq.

6 Vincent Mayo, Esq.

7 Nevada State Bar Number: 8564

8 6252 South Rainbow Blvd., Suite 100

9 Las Vegas, Nevada 89118

10 Attorney for Plaintiff

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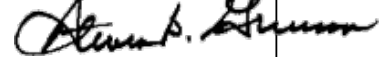
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Entry of Order After Hearing of April 6, 2019* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Wednesday, April 22, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Jack W. Fleeman, Esq.

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



**ORDR**

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
Plaintiff,	)	Department: I
vs.	)	
	)	Date of Hearing: April 6, 2020
CHALESE MARIE SOLINGER,	)	Time of Hearing: 9:30 a.m.
	)	
Defendant.	)	

**ORDER AFTER HEARING OF APRIL 6, 2020**

This matter coming on for hearing on the on the 6<sup>th</sup> day of April 2020, before the Honorable Cheryl B. Moss, upon Plaintiff's *Motion for Change of Custody Based on Defendant's Endangerment of the Minor Children, for Marie's Birth Certificate, for Attorney's Fees and Costs and Related Relief* and Defendant's *Opposition and Countermotion for an Order to Show Cause, Compensatory Visitation Time and Attorney's Fees* and Plaintiff's *Reply in Support and Opposition to Countermotion* with Plaintiff, ADAM MICHAEL SOLINGER (hereinafter referred to as

1 "Adam"), having appeared by and through his attorney of record,  
2 VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM, and  
3 Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as  
4 "Chalese"), having appeared by and through her attorney of record,  
5 JACK FLEEMAN, ESQ., of PECOS LAW GROUP. Court having listened  
6 to the representations and arguments of counsel, and good cause  
7 appearing:

8 **THIS COURT HEREBY NOTES** that all Parties appeared by  
9 video.

10 **THIS COURT FURTHER NOTES** that discussion regarding  
11 whether Defendant's counsel having a conflict of interest to represent  
12 Defendant. Upon Court's inquiry, Defendant has confirmed she has  
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19 representations of Defendant and her counsel, there is no conflict of  
20 interest related to Defendant rehiring The Pecos Law Group.

21 ///

1       Therefore, and for good cause showing,

2       **IT IS HEREBY ORDERED** that based on Plaintiff's allegations,  
3 the current COVID-19 crisis, and an abundance of caution, Plaintiff has  
4 temporary sole legal and sole physical custody of the children until April  
5 13, 2020 at 9:45 a.m.

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8       **IT IS FURTHER ORDERED** that Department I shall send both  
9 Counsel a copy of the CPS records.

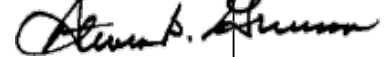
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14 Thursday, April 9, 2020. The Court shall review same prior to the return  
15 hearing issue is deferred until the return hearing, currently set for  
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18 at 9:30 a.m. is vacated and reset to April 13, 2020 at 9:45 a.m.

19       **IT IS FURTHER ORDERED** that this matter shall be continued  
20 to the hearing set for April 13, 2020, at 9:45 a.m.

21       ///





**MOT**

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](mailto: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,	)	
	)	<b>Oral Argument is Requested</b>
Defendant.	)	
	)	

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 FOURTEEN (14) DAYS 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 A HEARING PRIOR TO THE SCHEDULED HEARING DATE.

**MOTION FOR AN ORDER TO PERMIT PLAINTIFF TO RETAIN  
THE SICK MINOR CHILDREN PURSUANT TO THEIR  
PEDIATRICIAN'S DIRECTIVE; FOR ATTORNEY'S FEES AND  
COSTS AND RELATED RELIEF**

NOW INTO COURT comes Plaintiff, ADAM MICHAEL SOLINGER,  
by and through his attorney, Vincent Mayo, Esq., of The Abrams & Mayo  
Law Firm, and hereby submits his *MOTION FOR AN ORDER TO  
PERMIT PLAINTIFF TO RETAIN THE SICK MINOR CHILDREN*

1 *PURSUANT TO THEIR PEDIATRICIAN'S DIRECTIVE; FOR*  
2 *ATTORNEY'S FEES AND COSTS AND RELATED RELIEF.*

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

6 Dated Sunday, April 26, 2020.

7 Respectfully Submitted,

8 THE ABRAMS & MAYO LAW FIRM

9 /s/ Vincent Mayo, Esq.

10 Vincent Mayo, Esq.

11 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Plaintiff

12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **I. STATEMENT OF FACTS**

14 Plaintiff, ADAM SOLINGER ("Adam") and Defendant, CHALESE  
15 SOLINGER, were married on May 12, 2012 in Las Vegas, Nevada. There  
16 are two (2) minor children of the marriage, to wit: Michael Adam Solinger  
17 ("Michael"), born June 16, 2015 (4 years of age); and Marie Leona  
18 Solinger ("Marie"), born August 28, 2017 (2 years of age). Adam is 31 years  
19 old and Chalese is 29 years old.

20 On April 22<sup>nd</sup>, Adam had Michael and Marie for his custodial time.  
21 Before dinner, Adam had Marie go clean her room. While she did, Adam



1 went to help with dinner. Adam came back just five minutes later to check  
2 on Marie and found her asleep. Adam tried to put her down to bed but she  
3 woke up and said she wanted something to eat. At dinner, Marie was  
4 warm and acting very tired and lethargic. Adam became concerned and  
5 took her temperature. Marie's temperature was at 104 degrees. Adam  
6 gave Marie some Motrin and laid her down. He thereafter recorded  
7 Marie's temperature, which was at 102.8 degrees.<sup>1</sup> Then, and out of an  
8 abundance of caution, Adam called the COVID-19 hotline. They in turn  
9 advised that Adam call Marie's doctor.

10 Adam called the after-hours number for the pediatrician's office and  
11 left a message. Dr. Tresa Chakkalakal (Dr. Tresa) returned Adam's call.<sup>2</sup>  
12 When Adam explained the fever and his concerns, Dr. Tresa advised  
13 Adam to treat Marie at home like Adam would for any other fever and to  
14 monitor her symptoms. Dr. Tresa said that given the uncertainty of  
15 Marie's condition and in light of the COVID-19 pandemic, Adam needed  
16 to follow the CDC guidelines regarding quarantining Marie, with the  
17 guidelines stating Marie would need to be quarantined:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); and

<sup>1</sup> See the photo of same, attached as **Exhibit 1**.

<sup>2</sup> See the photos of call logs, attached as **Exhibit 2**.

- 1       • At least 7 days have passed since symptoms first appeared.

2       Adam did specifically ask Dr. Tresa about whether Marie could go  
3 to Chalese's house where another young boy, Jesse, lives. Dr. Tresa said  
4 no because the doctor did not know what Marie has and Marie is likely  
5 contagious.

6       Dr. Tresa further stated that if Marie develops vomiting, earache,  
7 painful urination, or respiratory tract symptoms, that Adam would need  
8 to arrange to bring her in to be seen right away. When Adam asked about  
9 testing Marie for COVID-19, Dr. Tresa said that they only had 4 or 5  
10 COVID-19 testing kits left and that they are saving them for those with  
11 severe symptoms.

12       Upon hanging up with Dr. Tresa, Adam relayed this information to  
13 Chalese and explained to her what the doctor said to do. Chalese's only  
14 response was, "I'll pick them up like normal on Friday." The next morning  
15 (April 23<sup>rd</sup>), Adam had his counsel reach out to Chalese's to try, under the  
16 circumstances, to have them change Chalese's mind.<sup>3</sup> Attached to the  
17 letter were photos of the readings of the children's fevers via the electronic  
18 thermometer.<sup>4</sup> It was also recommended that Chalese reach out to the  
19 children's pediatrician to confirm what Adam had been told. Further,

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21       

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<sup>3</sup> See the April 23<sup>rd</sup> correspondence to Pecos Law Group, attached as **Exhibit 3**.

<sup>4</sup> *Id.*

1 Photos and videos of Adam taking Marie's temperature (showing her  
2 fever) were emailed to Chalese's counsel.<sup>5</sup> Then, later that same day,  
3 Michael developed a fever.

4 Mr. Mayo stated on the 23<sup>rd</sup> that Adam did not want to be in  
5 violation of the custodial schedule so if Chalese would not agree to Adam  
6 keeping the children during her weekend time, based on the pediatrician's  
7 medical advice, he would need to file a motion. Ms. Exley stated Chalese  
8 was following up with the pediatrician, to which Mr. Mayo responded that  
9 he would hold off on filing his motion while Chalese did. Ms. Exley did not  
10 oppose this position.

11 ***The next day, and despite the fact Dr. Tresa told Adam to***  
12 ***keep Marie quarantined at his home,<sup>6</sup> Chalese astonishingly***  
13 ***and in the middle of a pandemic, wanted to negotiate***  
14 ***regarding Adam keeping the children quarantined.*** Specifically,  
15 Chalese had Ms. Exley send a letter stating that Chalese would agree to  
16 Adam keeping the children quarantined only if Adam agreed to certain  
17 conditions: (1) Chalese getting confirmation from the pediatrician as to  
18 what was represented to Adam; (2) Chalese getting make-up time for  
19 every day she misses; (3) Adam sending videos of the children's fevers

21 <sup>5</sup> See the email with the video attachment, attached as **Exhibit 4**.

<sup>6</sup> Advice that would apply to both children once Michael got a fever.

1 twice a day; and (4) Adam giving Chalese daily video time with the  
2 children. Ms. Exley did state that she heard from an assistant of Dr. Tresa  
3 that Adam had been advised to keep the children quarantined until the  
4 children's fevers were gone<sup>7</sup> and to bring them in if their fevers persisted  
5 longer than 7 days.

6 In response to Chalese's "ultimatum,"<sup>8</sup> Adam stated what he was  
7 told by Dr. Tresa was accurate but that he was not agreeable to not  
8 quarantining the children until Chalese had exact confirmation of same.  
9 Adam was also not in agreement with Chalese getting make up time. It  
10 was conveyed that make-up time is related to the Court finding a parent  
11 has been wrongly denied time with the children due to the other parent's  
12 actions.<sup>9</sup> That is not the case here as an illness is the reason for the  
13 quarantining. Regardless, Adam was fine with Chalese continuing to have  
14 daily video contact with the children (which Chalese had on both Friday  
15 and Saturday nights and by phone on Sunday night as Chalese  
16 represented her camera was not working). Finally, Adam stated he was

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17  
18 <sup>7</sup> What Adam does not know is what Chalese told the pediatrician's office. If she told  
19 them she was practicing proper social distancing / quarantining, they may have stated  
20 that the quarantining for 7 days after the onset of fevers is not necessary. However,  
21 Adam and the Court know Chalese was not, meaning the 7 days of quarantining is  
necessary.

<sup>8</sup> See the April 24<sup>th</sup> letter to Chalese's counsel, attached as **Exhibit 5**.

<sup>9</sup> Adam would note that Chalese has balked in the past about wanting make-up time  
but she continuously refuses to acknowledge the loss of time is due to Chalese mixing  
up the scheduled days, ignoring Adam's notifications about vacation time or Chalese  
flat out forgetting her own days.

1 obviously fine with keeping Chalese updated as to their medical condition  
2 but saw no reason to send videos of the children's fevers if they were  
3 normal.

4 The next day, in response to Chalese asking for proof of the  
5 children's current temperatures, Adam updated Chalese and told her that  
6 the children's temperatures were back to normal.<sup>10</sup> Adam then updated  
7 Chalese as to how the children did on Friday given that she did not bother  
8 to ask how the children were at all on Friday. Despite this, Chalese tried  
9 to accuse Adam of "neglecting the children's care" by not taking them in  
10 to the ER. Chalese's counsel also made this representation even though  
11 Chalese verified that the pediatrician's office said for Adam not to seek  
12 medical treatment unless the fevers lasted for longer than 7 days and  
13 Adam got the children's temperatures under control over a short period  
14 of time.

15 Mr. Mayo responded,<sup>11</sup> making it clear that Adam was following the  
16 pediatrician's instructions. It was also conveyed that there was no need to  
17 unnecessarily take the children out of quarantine and to an ER when their  
18 fevers were brought under control. Further, it was hypocritical of Chalese  
19 to call Adam negligent when it was very likely that the children became  
20

21 <sup>10</sup> See the April 25<sup>th</sup> AppClose exchange between the parties, attached as **Exhibit 6**.

<sup>11</sup> See the April 25<sup>th</sup> emails between counsel, attached as **Exhibit 7**.

1 sick during her time: It was Chalese who this Court found has continually  
2 disregarded quarantine directives and it was Chalese who travelled out of  
3 state. No one other than the children in Adam's house is sick or has any  
4 symptoms and Adam, Jessica and her daughter have been following social  
5 distancing and quarantining protocol.

6 Despite all this, Chalese's counsel stated Adam was violating the  
7 Court's order and that she would be filing a motion. This motion follows.

## 8 **II. LAW AND ARGUMENT**

### 9 **A. Adam Should Continue Quarantining the Minor** 10 **Children in Accordance with the Pediatrician's** **Medical Directives**

11 NRS 125C.0045 states in relevant part:

#### 12 **[M]odification or termination of orders.**

13 1. In any action for determining the custody of a minor child,  
the court may, except as otherwise provided in this section and NRS  
125C.0601 to 125C.0693, inclusive, and chapter 130 of NRS:

14 (a) During the pendency of the action, at the final hearing or  
15 at any time thereafter during the minority of the child, make such  
an order for the custody, care, education, maintenance and support  
16 of the minor child as appears in his or her best interest;...

17 After becoming sick, and in light of the pandemic, the children's  
18 pediatrician directed Adam to quarantine the children pursuant to CDC  
19 guidelines. That is what Adam has done. He has also taken reasonable  
20 efforts to keep Chalese informed by updating her as to the children's  
21 fevers and what he is doing to treat same. Adam has also been providing  
Chalese daily video contact with the children. Therefore, as the children's

1 best interests are the Court's utmost concern under *Rivero v. Rivero*, 216  
2 P.3d 213 (2009), the custodial schedule should be temporarily deviated  
3 from to allow for the pediatrician's directives to remain in place, especially  
4 in light of the CDC's COVID-19 protocol.

5       Instead of being supportive, Chalese is again displaying her poor  
6 judgment by attempting to manipulate the situation. Chalese demands  
7 that Adam do certain things or otherwise she will not agree to the  
8 pediatrician's directives. The children's best interests are not something  
9 to be bartered or compromised. The fact Chalese does not understand her  
10 actions are harmful to the children is very telling.

11       The same applies to Chalese's attempt to falsely claim Adam was  
12 "neglectful" in not taking the children to the ER when they only had the  
13 fevers for a short time, the pediatrician stated not to take them in unless  
14 the fevers persisted for more than seven days or if the fevers could not be  
15 controlled. The fevers disappeared by Saturday morning, although  
16 Michael had a slight fever upon waking on Sunday morning which is since  
17 under control. It is clear that Chalese is only fabricating her allegation in  
18 retaliation for Adam having exposed Chalese's long list of decisions and  
19 behavior that have been harmful to the children.

20       This Court should deviate the custody schedule to allow the children  
21 to follow their pediatrician's quarantine advice and stay with Adam until

1 Chalese's next normal custody time share, which is May 8th at 6 p.m.

2 In the event that between now and then Chalese or any member of  
3 her household continues to not follow social distancing measures, this  
4 Court should award sole custody to Adam until the COVID-19 social  
5 distancing and quarantine protocols are lifted. The parties do not know  
6 what the children are sick with given the scarcity of COVID-19 tests  
7 available and the fact that the children, fortunately, appear asymptomatic.  
8 However, this serves as a very potent reminder of what can happen when  
9 proper social distancing measures are not followed. Chalese was already  
10 given a chance to follow the right measures and yet the children still got  
11 sick. The children cannot be risked yet again given the circumstances.  
12 Their best interest is in staying safely with Adam who the parties know is  
13 practicing strict social distancing protocols.

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

15 Chalese is the one who continuously and intentionally violates this  
16 Court's orders, thereby jeopardizing the safety of the children in the  
17 process and preventing her and Adam from co-parenting together. It is  
18 Chalese's conduct that has driven Adam to file this motion and seek the  
19 help of the Court. Adam should therefore be made whole and not be forced  
20 to go out of pocket in order to protect his children's welfare. Adam shall  
21 submit a Memorandum of Fees and Costs addressing the *Brunzell* factors



1 upon direction from the Court.

2 **III. CONCLUSION**

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

6 Dated Sunday, April 26, 2020.

7 Respectfully Submitted:

8 THE ABRAMS & MAYO LAW FIRM

9 /s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

10 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

11 Las Vegas, Nevada 89118

Attorney for Plaintiff

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**DECLARATION OF ADAM MICHAEL SOLINGER**

I, ADAM MICHAEL SOLINGER, provide this Declaration pursuant to NRS 53.045 and states the following:

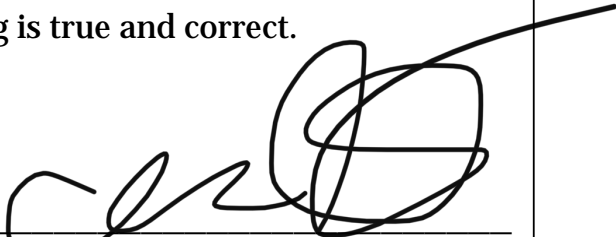
1. I am the Plaintiff in the above-entitled action, and I am above the age of majority and am competent to testify to the facts contained in this affidavit.

2. I make this affidavit in support of the foregoing *MOTION FOR AN ORDER TO PERMIT PLAINTIFF TO RETAIN THE SICK MINOR CHILDREN PURSUANT TO THEIR PEDIATRICIAN'S DIRECTIVE; 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.

4. I declare under the penalty of perjury pursuant to the laws of the State of Nevada that the foregoing is true and correct.

Dated this 26<sup>th</sup> day of April, 2020.

  
ADAM MICHAEL SOLINGER

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *MOTION FOR AN ORDER TO PERMIT PLAINTIFF TO RETAIN THE SICK MINOR CHILDREN PURSUANT TO THEIR PEDIATRICIAN'S DIRECTIVE; FOR ATTORNEY'S FEES AND COSTS AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Sunday, April 26, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Jack Fleeman, Esq.  
Attorney for Defendant

/s/ David J. Schoen, IV, ACP  
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/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

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

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

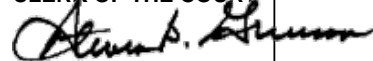
☒ \$0 ☐ \$25 ☐ \$57 ☐ \$82 ☐ \$129 ☐ \$154

Party filing Motion/Opposition: Plaintiff/Petitioner Date 04/26/2020

Signature of Party or Preparer



002099



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  
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 **APPENDIX OF EXHIBITS IN SUPPORT OF MOTION FOR AN**  
15 **ORDER TO PERMIT PLAINTIFF TO RETAIN**  
16 **THE SICK MINOR CHILDREN PURSUANT TO THEIR**  
17 **PEDIATRICIAN'S DIRECTIVE; FOR ATTORNEY'S FEES AND**  
18 **COSTS AND RELATED RELIEF**

17 Exhibit	Description
18 1	Photo showing Marie's temperatures
19 2	April 22 <sup>nd</sup> call logs to the pediatrician
20 3	April 23 <sup>rd</sup> correspondence to Pecos Law Group
21 4	E-mail with video attachment of Marie's temperature
5	April 24 <sup>th</sup> correspondence to Pecos Law Group

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6	April 25 <sup>th</sup> AppClose exchanges between the parties
7	April 25 <sup>th</sup> emails between counsel

Dated Monday, April 27, 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 MOTION FOR AN ORDER TO PERMIT PLAINTIFF TO RETAIN THE SICK MINOR CHILDREN PURSUANT TO THEIR PEDIATRICIAN’S DIRECTIVE; FOR ATTORNEY’S FEES AND COSTS AND RELATED RELIEF* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Monday, April 27, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Jack Fleeman, Esq.

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

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1





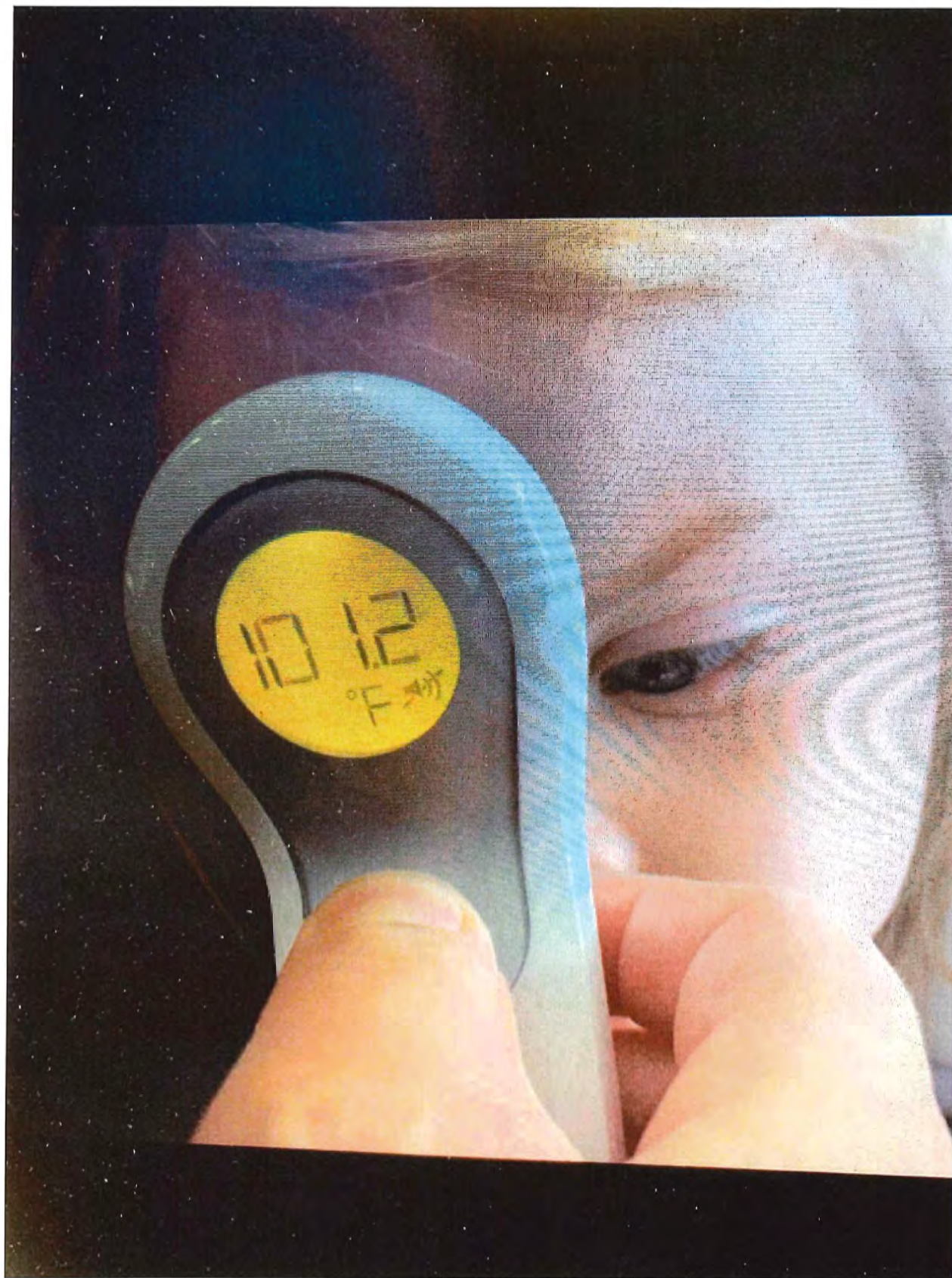


EXHIBIT 2

EXHIBIT 2

EXHIBIT 2



7:39



< Recents



(702) 363-3000

Las Vegas, NV



message



call



pay

Yesterday

6:36 PM **Outgoing Call**

5 minutes

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location



Favorites



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17

7:39



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No Caller ID  
unknown

Yesterday

7:10 PM Incoming Call  
7 minutes



Favorites



Recents



Contacts



Keypad



Voicemail

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3



\*\* 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, April 23, 2020

Alicia S. Exley, Esq.  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074

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

URGENT ATTENTION IS REQUESTED

Dear Ms. Exley:

I am writing to try and resolve an emergency matter that has arisen. Yesterday and before dinner, Adam had Marie go clean her room. Adam went to help with dinner while Marie was to clean her room and when Adam came back just five minutes later, Marie had fallen asleep. Adam tried to put her down to bed but she woke up and mumbled that she wanted something to eat. At dinner, Marie was warm and acting very tired and lethargic. Adam became concerned and took her temperature. Marie's temperature was at 104 degrees. Adam gave Marie some Motrin and laid her down. He thereafter recorded Marie's temperature, which was at 102.8 degrees.<sup>1</sup> Then, and out of an abundance of caution, Adam called the COVID-19 hotline. They in turn advised that Adam call Marie's doctor.

Adam called the after-hours number for the pediatrician's office and left a message. Dr. Tresa Chakkalakal (Dr. Tresa) returned Adam's call.<sup>2</sup> When Adam explained the fever and his concerns, Dr. Tresa advised Adam to treat Marie at home like Adam would for any other fever and to monitor her symptoms. Dr. Tresa said that given the uncertainty of Marie's condition and in light of the COVID-19 pandemic, Marie needed to quarantine at home for the next 7 days at least and be fever free for 72 hours. So Chalese knows, Adam did specifically ask about whether Marie could go to Chalese's house where another young boy, Jesse, lives. Dr. Tresa said no because the doctor did not know what Marie has and Marie is likely contagious.

Dr. Tresa further stated that if Marie develops vomiting, earache, painful urination, or respiratory tract symptoms, that Adam would need to arrange to bring her in to be seen right away. Dr. Tresa said that they only have 4 or 5 COVID-19 testing kits left and that they are saving them for those with severe symptoms.

///  
///

<sup>1</sup> See the photo of same attached hereto.

<sup>2</sup> See the photos of call logs attached hereto.

---

† Board Certified Family Law Specialist

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

Thursday, April 23, 2020  
Adam M. Solinger v. Chalese M. Solinger  
Page 2 of 2  
The Abrams & Mayo Law Firm

Upon hanging up with Dr. Tresa, Adam relayed this information to Chalese and explained to her what the doctor said to do. Chalese's only response was, "I'll pick them up like normal on Friday." So you know, Adam gave Marie Motrin again this morning and recorded her temperature thereafter. Even with the Motrin in her, Marie's temperature was at 101.2 degrees.<sup>3</sup>

Chalese is obviously welcome to call Dr. Tresa and confirm the information she provided Adam last night. We would also ask that you please speak to Chalese and help her understand the seriousness of the situation and that Adam is only following Marie's pediatrician's medical advice. Adam understands Chalese wants to have the children for her time but Marie's needs and the doctor's recommendations, especially in light of the COVID-19 pandemic, take precedence – a position I feel certain Judge Moss would agree with.

Your cooperation and assistance in this matter is greatly appreciated.

Sincerely,

THE ABRAMS & MAYO LAW FIRM

/s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

cc: Mr. Adam M. Solinger

---

<sup>3</sup> See the photo of same attached hereto.



EXHIBIT 4

EXHIBIT 4

EXHIBIT 4

## Vincent Mayo

---

**From:** Vincent Mayo  
**Sent:** Thursday, April 23, 2020 5:01 PM  
**To:** Alicia S. Exley (Alicia@pecoslawgroup.com)  
**Subject:** Solinger  
**Attachments:** IMG\_1827.mov

Sincerely,

Vincent Mayo, Esq.  
Board Certified Family Law Specialist  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
Fax: (702) 248-9750  
[www.TheAbramsLawFirm.com](http://www.TheAbramsLawFirm.com)

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5



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

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

Friday, April 24, 2020

Alicia S. Exley, 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 Ms. Exley:

I am in receipt of your April 22, 2020 correspondence. After discussing the matter with my client, we respond accordingly.

It is clear Chalese is maintaining her pattern of dishonesty with you, as she has through this litigation. Or, you are engaging in unethical and dishonest conduct.

### **Insurance**

Unfortunately, Chalese is completely misrepresenting the situation with the health insurance. Chalese never provided Adam with notice as to what information she states she requires. On Monday April 20th, Adam asked Chalese how she wanted to proceed with the issue of health insurance. Chalese's options are to either stay on the plan that has been in effect for the past few years and essentially take over the account, along with the payment, or she can find private insurance on her own given the open enrollment period. Chalese balked at this question, firing back stating that Adam has not "even provided [her] with insurance information..." Adam then asked if Chalese needed a bill for proof of continuing payment or an insurance card. Chalese never responded.

You state in your letter that you read the relevant "AppClose" messages in support of your correspondence but did Chalese give you the entire message thread on this topic? If you had, it would show that Adam was trying to resolve the issue with Chalese, as well as attempting to co-parent.

The health insurance has not changed, as mentioned at the last hearing, due to Chalese refusing to provide Adam a copy of Marie's birth certificate. As a result, Adam was keep the old policy, thereby being forced to pay the \$1,237.94 premium for the month of April.

As for the claim that Chalese does not have any information regarding the insurance, this is another lie. Adam provided Chalese with March's bill for insurance on February 27, 2020, and sent her the April bill yesterday. Chalese also already has an insurance card because as she paid \$87.29 towards the deductible this year and she has paid some out-

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† Board Certified Family Law Specialist

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

of-pocket expenses as well. Nonetheless, another copy of the cards is attached to this letter.

Adam previously asked Chalese what she wanted to do and has not received a response. To avoid being billed for the month of May, Adam is canceling the plan as it relates to himself and the children with an effective date of the end of the month. Adam has forwarded Chalese information to the insurance company so they could have her take over the policy.

### **Marie's Fingers and Nails**

The nail polish issue is a co-parenting issue as the original letter makes clear. For reference, the issue is not the painting of the nails. It is that Marie picks her nails and fingers once they are painted and it causes her fingertips to bleed. Chalese herself has previously indicated in her AppClose messages that she agrees with not painting Marie's nails. Being that you review the AppCloses messages, you should have seen these.

Despite Chalese's attempts to spin the narrative as one of control, it's not as Chalese herself states Marie's nails should not be painted. The issue is Chalese going back on what the parties already agreed is in Marie's best interests. It was Chalese going back on her agreement that caused Adam to have me bring the issue up with you.

The issue with the haircutting is not that it happens but rather that Chalese cuts the children's hair almost every single time she has them. Adam merely wants to be involved in decisions regarding the grooming of the children because it's not possible to put hair back on the head. I think we can agree that if the roles were reversed and Adam was taking the children to have their hair cut every week, Chalese would be requesting the exact same. This is about reasonableness and Adam has made a simple request to have Marie's hair longer for a photoshoot that he is planning for her. Adam agrees that it is silly and a waste of time and money to have to discuss this issue through counsel but Chalese has given him no other recourse. If anything, this is a control issue on Chalese's part: She knows that Adam is trying to plan something with Marie and she is evidently trying to sabotage it. If Chalese refuses to be accommodating on such a simple co-parenting issue matter, then so be it. This will simply be added to the voluminous list of items Adam has showing that Chalese clearly doesn't know how to co-parent.

### **April's Spousal Support**

Finally, the issue with April's support payment is that your client consistently refuses to contribute to the expenses she incurs and is ordered to pay, such as Chalese's half of the costs for health insurance covering her and the children. Chalese informed Adam that she would pay her half of insurance once she received her spousal support for March. Adam did so but low and behold, Chalese refused to pay Adam her one-half of the health insurance costs. Please reign your client in and inform her that it is imperative that she has financial obligations that need to be paid. What goes unsaid in your letter is that presumably Chalese is collecting unemployment and that she received a stimulus check, Which Adam wasn't as fortunate to receive.

If we are threatening to bring motions and requests for orders to show cause, you may want to have a very frank conversation with your client, especially given that she has two attorneys working her case and that she has a near bottomless pool of money she keeps pulling from after claiming poverty on a consistent basis.

Adam has had to drastically cut his legal expenses and as he has represented consistently, he drafts nearly most of the pleadings and letters and I merely revise them, which is a huge cost savings to him.

Despite your incorrect assertion, Adam's spousal support was not reduced because of health insurance, it was reduced commensurate with the drop-in salary due to Adam's new job.

Also, Adam does not owe Chalese support for March or April. In February, the Court ordered that Adam would deduct Chalese's half of the old monthly health insurance premium for herself and the children. The total is \$1,237.94 per month, meaning that the portion for Chalese and the children is \$928.46, making half \$464.23.

You will recall that the Court prorated Adam's spousal support for March based on him switching jobs in mid-month. This means Adam would pay half of support under the old pay, \$1,125 (\$562.50) and half of his support under his new income, \$800 (\$400). This means that Adam was to pay \$962.50, minus Chalese's half of the insurance (\$464.23), which comes out to \$498.27. However, Adam in fact paid \$562.50 for March, an overpayment of \$64.23.

For April, Adam was to pay \$800 for spousal support. However, Adam had reached out to Chalese in late March asking her for a copy of Marie's birth certificate. By doing so, Adam would have been able to switch over to the new insurance, which would have reduced the children's cost of the health insurance premium starting in April to \$52 (instead of the \$618.97 under the old plan). You will recall Adam told Chalese this via AppClose, with Chalese stating she refused to give him a copy as timely needed. This resulted in the old policy unnecessarily remaining in place for April.

So it's clear, Adam and the children's cost under the new policy would have been a total of \$82 (\$30 for Adam, \$52 for the children). Because Chalese refused to allow Adam and the children to switch to the new policy for April, it resulted in Adam unnecessarily paying a much higher amount. The following addresses this inequity and what is actually owed now:

#### Adam's Portion

What Adam should have paid for himself for April under the new policy: \$30.

What Adam was forced to pay for himself in April under the old policy: \$309.25.

Hence, Chalese owes Adam \$309.25 for forcing him to pay under the old amount.

#### Children's Portion

What Adam should have paid for his half of the children for April under the new policy: \$26.01.

What Adam was forced to pay for his half of the children for April under the new policy: \$618.50.

Hence, Chalese owes Adam the difference between the \$618.50 and \$26.01, or \$592.50.

#### Chalese's Portion

Chalese's portion for April that Adam paid was \$309.25, making Chalese's one-half \$154.74.

These costs for April that Chalese is responsible for total \$1,056.49.

Therefore, the total Chalese owes Adam for March is the \$64.23 overpayment and the \$1,056.49 for April, which comes out to \$1,120.72. Being that Adam owed Chalese support in April of \$800, she actually must pay Adam the difference, which is \$320.72. Adam is agreeable to deducting same from the May payment. Would your client prefer Adam reduce the amount of May support by the remaining balance or would your client like to tender the remaining balance directly to Adam instead?

In sum, please have a conversation with your client as requested in the previous letter. Additionally, Adam had no choice but to cancel the policy as it relates to himself and the children thus making Chalese the only one on the account. If she would like to, she can take advantage of this special enrollment period to find insurance to her liking by the aforementioned time.

Also, and on an unrelated but tedious topic, please provide proof of client's current car insurance coverage since June of last year. We have asked for this several times and still not received it.

#### **The Children's Sicknesses**

Adam wants to be clear that the children being sick and needing to stay self-isolated and in quarantine is not a matter of compromise. It is on the direct advice of the children's pediatrician, is spelled out within the CDC guidelines and it comports with the Governor's order. So you are aware, the following are the CDC's guidelines as to when a person suspected of potentially having COVID-19 no longer has to quarantine:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications **and**
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**,
- At least 7 days have passed since symptoms first appeared.

What Adam stated was conveyed to him by Dr. Teresa was accurate. Dr. Teresa did state that if there is was a lack of social distancing or proper quarantining that the CDC guidelines are for children to be quarantined for at least 7 days after the fevers disappear. Being that Judge Moss stated during the last two hearings that Chalese was not practicing proper social distancing, this is a credible concern. The median incubation period for COVID-19 is 5 days. Michael and Marie were with Chalese April 16-17 and then they both had fevers 5 days later. Let us hope that this is a simple viral infection and not COVID-19.

What Adam does not know is what Chalese told the pediatrician's office. If she told them she was practicing proper social distancing / quarantining, they may have stated that the quarantining for 7 days after the fevers disappears is not necessary. However, Adam and the Court know Chalese was not, meaning the 7 days of quarantining is necessary. As for your client's request that Adam somehow immediately go to the pediatrician's office at 4:00 p.m. on a Friday afternoon when he is tending to two sick children, he cannot.

Adam of course concedes following healthcare orders does not mean that Chalese is uninterested in having the children. However, Adam is appalled that the children are sick and believe it is due to your client's actions: It was Chalese who continually disregarded quarantine directives and it was Chalese who travelled out of state. No one other than the children in Adam's house is sick or has any symptoms and Adam, Jessica and her daughter have been quarantining. Further, even if Adam was able to take the children in to their pediatrician for testing, Dr. Teresa told Adam they only have around 4 to 5 testing kits and they are only providing those to children who come in with severe symptoms.

Adam has no issue updating Chalese via AppClose but it is concerning that Chalese has not asked Adam for an update regarding how the children are doing since 8:30 a.m. yesterday morning. Why is it Chalese wants Adam to constantly update her but she doesn't care enough about her own children to ask Adam their condition in two days? If Chalese wants updates, she can ask him.

In regard to the videos, Adam produced the videos of the temperatures as an act of good faith in the beginning because he knew that Chalese would be skeptical. However, their creation was not intended to add an additional step to the care of the children. Chalese has always stated that she trusts that the kids are in good care while in the care of Adam and has never expressed concern. Also, Adam has always been forthcoming when it comes to the health of the children. To imply that my client would be dishonest and needs to provide proof of temperature taking is insincere. If Chalese wants to know the children's temperatures, she can ask (which she rarely has in the past when the children are sick). However, Adam will not be producing two videos a day of temperature readings. Chalese can ask Adam how they are doing and he will tell her how they are doing.

Adam is not in possession of any medical documents at this time. Adam called the after-hours number and the on-call doctor returned his call and gave him the advice previously provided. Telephonic medical appointments are very common at this point in time and at this point there is no need to expose the kids to the public if they do not have COVID-19 or, hopefully this isn't the case, exposing others if the kids do indeed have COVID-19. The children would only go into see the doctor if they develop other symptoms requiring immediate attention.

Adam will not agree to any make-up time before trial. The Court has previously ruled that make-up time would be deferred to the time of trial. Further, Chalese is not losing time due to anything Adam did but rather the advice of the children's doctor.

Finally, as to phone contact, Adam has no issue with the same. However, the examples Chalese cites are extremely disingenuous and reveal the true tone of your correspondence



Friday, April 24, 2020  
Adam M. Solinger v. Chalese M. Solinger  
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The Abrams & Mayo Law Firm

on her behalf. As for this past Wednesday night, Chalese had no contact with the children because Adam had to wait on a call back from the pediatrician due very likely to your client's actions resulting in the children getting sick.

In summary, this issue is not about compromising or negotiating. The children are sick and their doctor's advice must be followed, especially in the present environment we live. For Chalese to state that "Adam should appreciate the fact that Chalese is losing time" as if it is Adam's fault or that she has something due to her is nonsensical. Adam does not "appreciate" that the children very likely became sick on Chalese's time and that he has to be concerned that the children may have COVID-19 because Chalese couldn't follow simple guidelines and chooses her own interests over the children's best interests. For Chalese to make such a statement means she does not appreciate the seriousness of the situation.

Your cooperation and assistance in this matter is greatly appreciated.

Sincerely,



THE ABRAMS & MAYO LAW FIRM

/s/ Vincent Mayo, Esq.


Vincent Mayo, Esq.

cc: Mr. Adam M. Solinger

4/22/2020

 <b>SIERRA HEALTH AND LIFE</b> A UnitedHealthcare Company		<b>MySHL SOLUTIONS</b> <b>INDIVIDUAL EPO PLAN</b>	
Health Plan (80840) <b>911-76342-01</b>			
Member ID: <b>150185922-01</b>		Group Number: <b>100035021001</b>	
Member: <b>CHALESE SOLINGER</b>			
Benefit Code: Medical <b>I18ES100</b> Rx <b>PI19ES00</b>		Payer ID <b>76342</b>	 <b>OPTUMRx</b> Rx BIN: <b>610279</b> Rx GRP: <b>UNEVADA</b> Rx PCN: <b>9999</b> Rx Cost share tiers: <b>I / II / III / IV</b> Rx Cost shares: <b>\$25/\$50/\$100/50%</b> Rx Deductible may apply.
Coplay: Office /Spec In Plan <b>\$15 /\$30</b>		Effective Date <b>01/01/2019</b>	
DOI-0501		Underwritten by Sierra Health and Life Insurance Co., Inc.	

In a life-threatening emergency, call 911 or go to an emergency room. Printed: 12/12/19



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Member Services:	1-888-293-6831
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For Providers: **SierraHealthandLife.com** 1-888-293-6831  
Medical Claims: SHL Claims, PO Box 15645, Las Vegas, NV 89114-5645

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Pharmacy Claims: OptumRx, PO Box 650540, Dallas, TX 75265-0540  
For Pharmacists: 1-800-443-8197

EXHIBIT 6

EXHIBIT 6

EXHIBIT 6



## Conversations

**4/25/2020**

**Chalese Anderson** on 4/25/2020 11:18AM said:

Please send videos of you taking the kids temperatures

**Adam Solinger** on 4/25/2020 11:33AM said:

Please talk to your attorney.

**Adam Solinger** on 4/25/2020 11:58AM said:

To be clear, I'm talking about taking videos of temperatures.

**Chalese Anderson** on 4/25/2020 2:42PM said:

Please send me proof of their temperatures

**Adam Solinger** on 4/25/2020 2:51PM said:

I know you haven't asked how they're doing, but so far today they haven't had a temperature. They're in good spirits but I'm still encouraging rest until they're in the clear.

**Chalese Anderson** on 4/25/2020 2:51PM said:

I would like proof of their temperatures

**Adam Solinger** on 4/25/2020 2:55PM said:

I'm not waking them up from their naps right now and shoving a thermometer in their face with a camera. I'm just telling you how they're doing because that's what important. Since you didn't ask yesterday, Marie spiked to 103.4 before her afternoon medicine kicked in and Michael spiked to 105.3 before his morning medicine kicked in and I got him in a cool bath. It dropped down to 101.7 after his bath.

**Chalese Anderson** on 4/25/2020 2:56PM said:

How could you not take them to the er?! You are being reckless

**Chalese Anderson** on 4/25/2020 2:56PM said:

Take them to be seen and I will meet you there

**Adam Solinger** on 4/25/2020 3:00PM said:

They currently have no fever why would they go to the ER? I treated the fever yesterday based on the same advice I got from their doctor. Without other symptoms, I would only be giving them Tylenol and Motrin alternating. Why would I take them somewhere where they could be exposed or expose others? It was under control. Had the bath and medicine not worked, we would be having a different conversation.



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EXHIBIT 7

EXHIBIT 7

EXHIBIT 7

## Vincent Mayo

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**From:** Vincent Mayo  
**Sent:** Saturday, April 25, 2020 4:46 PM  
**To:** Jack Fleeman  
**Subject:** RE: Solinger - Fevers  
  
**Importance:** High

Jack,

Chalese was updated yesterday through my communications with Alicia when I informed her that the children had fevers, notified her of the temperatures and what Adam was administering to them. Further, the children improved during the day and even had Facetime calls with her that lasted an unusually long 13 minutes. Today, he notified her that their temperatures dropped and that they have no fever. Therefore, why would he need to send her a photo of the children not having fevers if he told her they don't have fevers?

Chalese did not ask Adam at all yesterday how the children were doing. If Chalese is offended by this fact, that's on her as it was completely within her control. Further, Adam told Chalese today that the children have no temperatures with her response being, "How could you not take them to the ER?!" Why would Adam take them to a cramped ER with sick people all about if the children had no temperatures? The pediatrician said for Adam to monitor and treat the children at home and to bring them in if things worsened (such as the children having earaches, respiratory issues, etc.). It had only been two days since Marie ran a fever and one day since Michael did. Based on the pediatrician's advice, Adam monitored same and the children are doing better now. Hence, there was no need to take them to the ER yesterday or today.

Your client can try to spin this is she wants but the fact is she is the one with a history of not adhering to proper social distancing and quarantining protocol. While there is no way to be absolutely sure how the children contracted their illness, Adam and everyone in his household has been strict about social distancing and quarantining. As Judge Moss noted, Chalese has not.

As for make-up time, again, such a request is related to the Court finding a parent has been wrongly denied time with the children due to the other parent's actions. That is not the case here. I would note that Chalese has balked in the past about wanting make up time but she continuously refuses to acknowledge the loss of time is due to Chalese mixing up the scheduled days, ignoring Adam's notifications about vacation time or Chalese flat out forgetting her own days.

In regard to a "lack" of client control, I believe my client is acting reasonably and in line with the children's best interests. Chalese is the one who has gone through five firms during this litigation (and we both know what that means).

Regardless, my client will continue to keep Chalese apprised of the children's condition and as always, she is free to ask Adam how they are doing at any time she wants.

Sincerely,

Vincent Mayo, Esq.  
Board Certified Family Law Specialist  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
Fax: (702) 248-9750  
[www.TheAbramsLawFirm.com](http://www.TheAbramsLawFirm.com)

**From:** Jack Fleeman <Jack@pecoslawgroup.com>  
**Sent:** Saturday, April 25, 2020 3:54 PM  
**To:** Vincent Mayo <vmayo@tamlf.com>  
**Cc:** Angela Romero <angela@pecoslawgroup.com>; Alicia Exley <alicia@pecoslawgroup.com>  
**Subject:** Re: Solinger - Fevers

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The point is that he isn't communicating these severe conditions until the next day and then he is chastising Chalese for not asking, when clearly she did. Additionally, we are asking that he take them in when they have such high fevers. We aren't talking about when they have no fever.

You ignored our request that he take videos of the temperatures and for information from the doctor verifying what Adam claims he was told. It should also be noted that while Adam had a tantrum when Chalese didn't force Josh's child to be tested for COVID, he is more than happy to sit at home with kids with very high fevers, not get them tested or seen in person so their vitals can be checked, and blame Chalese.

Jack W. Fleeman, Esq.  
Certified Family Law Specialist

Pecos Law Group  
[702-388-1851](tel:702-388-1851)

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

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On Apr 25, 2020, at 3:43 PM, Vincent Mayo <[vmayo@tamlf.com](mailto:vmayo@tamlf.com)> wrote:



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Hello jack,

I spoke to my client and he states the children continued having fevers yesterday but the fevers subsided today. They are both currently at around 98.6 degrees. Further, Adam sent Chalese AppClose messages today updating her as to the above and notifying her the children at the present do not have fevers.

Sincerely,

Vincent Mayo, Esq.  
Board Certified Family Law Specialist  
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Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
Fax: (702) 248-9750  
[www.TheAbramsLawFirm.com](http://www.TheAbramsLawFirm.com)

**From:** Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)>  
**Sent:** Saturday, April 25, 2020 3:09 PM  
**To:** Vincent Mayo <[vmayo@tamlf.com](mailto:vmayo@tamlf.com)>  
**Cc:** Angela Romero <[angela@pecoslawgroup.com](mailto:angela@pecoslawgroup.com)>; Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)>  
**Subject:** Solinger - Fevers

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Your client reports that the children had fevers in excess of 104 degrees. Please advise him to take them to the ER. Those are extremely high temperatures.

He also claims Chalese didn't care about the temps yesterday. That's nonsense, clearly, as we asked yesterday that he provide that information to her daily.

Jack W. Fleeman, Esq.  
Certified Family Law Specialist

Pecos Law Group  
[702-388-1851](tel:702-388-1851)

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

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