

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

\*\*\*

ADAM MICHAEL SOLINGER,

Appellant,

VS.

CHALESE MARIE SOLINGER,

Respondent.

Case No.:

84832-COA

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Clerk of Supreme Court

**APPELLANT’S APPENDIX  
VOLUME 11**

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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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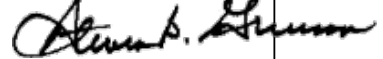
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**EXMT**

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 to address Upcoming Trial Date and Findings in Regard to Chalese's Refusal to Timely Facilitate the Completion of the Child Custody Evaluation*, which is currently set to be heard on August 3, 2020 at 9:00 a.m..

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

3 DATED: Monday, June 22, 2020.

4                                Respectfully Submitted,

5                                THE ABRAMS & MAYO LAW FIRM

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                              Tel: (702) 222-4021

12                              Fax: (702) 248-9750

13                              Attorney for Plaintiff

14        / / /

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**DECLARATION OF VINCENT MAYO, ESQ.**

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

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

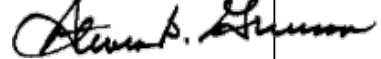
3. The *Motion to address Upcoming Trial Date and Findings in Regard to Chalese’s Refusal to Timely Facilitate the Completion of the Child Custody Evaluation* filed on June 22, 2020 is currently set to be heard on August 3, 2020. However, the first day of trial in this matter is set for June 30, 2020.

///  
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///

4. Therefore, I respectfully request this Court grant an Order Shortening Time and set this hearing for the soonest available date prior to the June 30, 2020 trial date. Otherwise, the purpose of Adam's Motion will be defeated.

Dated this 22<sup>nd</sup> day of June, 2020.

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



1 **OST**

Vincent Mayo, Esq.

2 Nevada State Bar Number: 8564

THE ABRAMS & MAYO LAW FIRM

3 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

4 Tel: (702) 222-4021

Fax: (702) 248-9750

5 Email: VMGroup@theabramslawfirm.com

Attorney for Plaintiff

Eighth Judicial District Court

Family Division

Clark County, Nevada

8 ADAM MICHAEL SOLINGER,

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

)

9 Plaintiff,

) Department: I

)

vs.

)

10 CHALESE MARIE SOLINGER,

) 06/30/2020

) 9:30AM

)

11 Defendant.

)

12 **ORDER SHORTENING TIME**

13  
14 Plaintiff having moved this Court to shorten the time in which to  
15 hear his *Motion to address Upcoming Trial Date and Findings in*  
16 *Regard to Chalese's Refusal to Timely Facilitate the Completion of the*  
17 *Child Custody Evaluation*, and this court, having read the Declaration of  
18 Vincent Mayo, Esq., attorney for Plaintiff, and the pleadings and papers  
19 on file herein, and good cause appearing therefore,

20 ///

1       **IT IS HEREBY ORDERED** that said hearing is hereby  
2 **SHORTENED** to be set on JUNE 30, 2020, at  
3 9:30AM, in Dept. I of said court. by video conference (bluejeans)  
4 DATED this 22 day of JUNE, 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

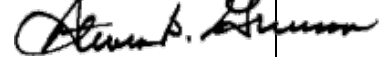
Las Vegas, Nevada 89118

12 Tel: (702) 222-4021

Fax: (702) 248-9750

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

Attorney for Plaintiff



1 **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 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 Monday, June 22, 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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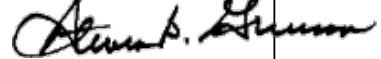
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**CERTIFICATE OF SERVICE**

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 Monday, June 22, 2020. Electronic service of the foregoing document as shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Alicia Exley, Esq.  
Jack Fleeman, 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

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5 Email: VMGroup@theabramslawfirm.com

Attorney for Plaintiff

Eighth Judicial District Court

Family Division

Clark County, Nevada

8 ADAM MICHAEL SOLINGER,

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

)

9 Plaintiff,

) Department: I

)

vs.

)

10 CHALESE MARIE SOLINGER,

) 06/30/2020

)

9:30AM

)

11 Defendant.

)

12 **ORDER SHORTENING TIME**

13  
14 Plaintiff having moved this Court to shorten the time in which to  
15 hear his *Motion to address Upcoming Trial Date and Findings in*  
16 *Regard to Chalese's Refusal to Timely Facilitate the Completion of the*  
17 *Child Custody Evaluation*, and this court, having read the Declaration of  
18 Vincent Mayo, Esq., attorney for Plaintiff, and the pleadings and papers  
19 on file herein, and good cause appearing therefore,

20 ///

1       **IT IS HEREBY ORDERED** that said hearing is hereby  
2 **SHORTENED** to be set on JUNE 30, 2020, at  
3 9:30AM, in Dept. I of said court. by video conference (bluejeans)  
4 DATED this 22 day of JUNE, 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

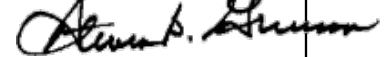
Las Vegas, Nevada 89118

12 Tel: (702) 222-4021

Fax: (702) 248-9750

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

Attorney for Plaintiff



1 OPPC  
2 **Jack W. Fleeman, Esq.**  
3 Nevada Bar No. 10584  
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 Tel: (702) 388-1851  
10 Fax: (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**

**Adam Michael Solinger,**

Plaintiff,

vs.

**Chalese Marie Solinger,**

Defendant.

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

Dept No. **I**

Date of Hearing: **June 30, 2020**

Time of Hearing: **11:15 a.m.**

**OPPOSITION TO MOTION TO ADDRESS UPCOMING TRIAL DATE AND**  
**FINDINGS IN REGARD TO CHALESE'S REFUSAL TO TIMELY FACILITATE**  
**THE COMPLETION OF THE CHILD CUSTODY EVALUATION**  
**AND**  
**COUNTERMOTION FOR PLAINTIFF TO FILE AN UPDATED FDF,**  
**FOR ATTORNEY'S FEES, AND RELATED RELIEF**

COMES NOW Defendant Chalese Marie Solinger ("Chalese") by and  
through her attorneys, **Jack W. Fleeman, Esq.** and **Alicia S. Exley, Esq.** of  
PECOS LAW GROUP, and respectfully submits her *Opposition to Motion to Address*

1 *Upcoming Trial Date and Findings in Regard to Chalese's Refusal to Timely*  
2 *Facilitate the Completion of the Child Custody Evaluation and Countermotion for*  
3 *Plaintiff to File an Updated FDF, for Attorney's Fees, and Related Relief, and*  
4  
5 respectfully requests that this court enter orders granting her the relief set forth at  
6 the end of this filing.

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

10 DATED this 26<sup>th</sup> day of June, 2020.

11  
12 PECOS LAW GROUP

13  
14 

15 **Jack W. Fleeman, Esq.**

16 Nevada Bar No. 10584

17 **Alicia S. Exley, Esq.**

18 Nevada Bar No. 14192

19 8925 South Pecos Road, Suite 14A

20 Henderson, Nevada 89074

21 Attorneys for Defendant

1 POINTS AND AUTHORITIES

2 I. OPPOSITION TO MOTION

3 A. INTRODUCTION

4 On June 17, 2020, the court sent counsel notice that the trial in this matter  
5 would not be heard on the scheduled dates of June 30, July 1, and July 2. *See*  
6 email from Judicial Executive Assistant, filed as **Exhibit “A.”** According to the  
7 court’s email, most of the court’s trials, not just the one in this case, were being  
8 continued several months out because of COVID-19.  
9

10 Despite the court’s clear statement that its decision to continue trial is related  
11 to the COVID-19 pandemic, Plaintiff **Adam Solinger** (“Adam”), without any  
12 attempt to communicate with Chalese or her attorneys, as required, has filed a  
13 motion “to address” the trial dates, blaming Defendant **Chalese Solinger**  
14 (“Chalese”) for the continuance. This, as the court must be painfully aware by  
15 now, is Adam’s M.O. – he files continuous motions, routinely seeks orders  
16 shortening time, and blames Chalese for anything and everything.  
17

18 Adam’s irrational and delusional belief that Chalese’s supposed failures in  
19 complying with Dr. Paglini’s evaluation were the reason for the court’s  
20 continuance of trial is irrelevant in analyzing his request to move forward with  
21 trial in a matter of days. The trial should not move forward on any of the dates  
22 previously ordered because undersigned counsel stopped preparing for trial once  
23 the court notified the parties and counsel that the trial was not moving forward.<sup>1</sup>  
24

---

25 <sup>1</sup> For example, counsel did not issue any trial subpoenas.  
26

1 Moreover, counsel believes that a continuance is necessary because Dr. Paglini's  
2 report, which will not be completed for a minimum of 5 weeks, is important to this  
3 case.<sup>2</sup> His report may help to resolve the matter, and it may require additional  
4 discovery, so that either party may take Dr. Paglini's deposition.

5 **B. STATEMENT OF FACTS**

6  
7 1. On November 15, 2019, Chalese filed a motion for a custody  
8 evaluation based upon Adam's statements in his deposition that he believed  
9 Chalese had "mental illness" and should have only four hours of supervised  
10 visitation per week with her children.<sup>3</sup>

11 2. Though Adam opposed Chalese's motion, on December 9, 2019, the  
12 court granted the motion, finding that a custody evaluation would assist the court.  
13 The court ordered counsel to confer and attempt to stipulate as to a child custody  
14 evaluator.<sup>4</sup>

15  
16 3. On December 27, 2019, Adam filed a motion for reconsideration of  
17 the December 9, 2019 order.

18 4. Adam's motion for reconsideration was not heard until February 26,  
19 2020, and was largely denied, with the court ordering that the custody evaluation  
20  
21

22  
23 <sup>2</sup> As further detailed below, Chalese is not the reason Dr. Paglini's report has been  
24 delayed well beyond the June 30 trial date.

25 <sup>3</sup> See *Defendant's Motion for a Custody Evaluation, Attorney's Fees, and Related Relief*,  
26 filed November 15, 2019.

<sup>4</sup> See *Order from December 9, 2019 Hearing*, filed February 6, 2020.



1 go forward. The parties agreed to use Dr. Paglini, with a report due in mid-June  
2 2020.

3 5. During the months of March and April, counsel communicated with  
4 Chalese and discussed her ongoing participation in the evaluation process.  
5 According to Chalese, Dr. Paglini believed he would be able to finish the  
6 evaluation by the June 15, 2020 deadline.  
7

8 6. On May 28, 2020, Chalese's counsel called Dr. Paglini's office to  
9 inquire as to an anticipated completion date for Dr. Paglini's report. Counsel left a  
10 message with Dr. Paglini's assistant, but did not receive a call back from either  
11 Dr. Paglini or his assistant.

12 7. The court held a hearing on June 1, 2020. During that hearing, Adam  
13 represented that he had spoken to Dr. Paglini the week prior and that Dr. Paglini  
14 was on track to complete his report on time.  
15

16 8. On June 15, 2020, Chalese's counsel called Dr. Paglini's office a  
17 second time to inquire as to the status of the report. Counsel left another message  
18 with Dr. Paglini's assistant. Again, counsel did not receive a call back.

19 9. On June 16, 2020, Chalese's counsel made a third call to Dr.  
20 Paglini's office to ask about the report. This time Dr. Paglini's assistant answered.  
21 The assistant informed counsel that Dr. Paglini did not have an estimated time  
22 when the report would be done, that he was still working on it, and still planning  
23 to do home visits. She mentioned she knew there was a hearing at the end of the  
24 month, so Dr. Paglini would aim to have the report done by then, but that he made  
25  
26

1 no guarantees. Chalese's counsel does not recall any comments being made by Dr.  
2 Paglini's office regarding any difficulties communicating with Chalese.

3       10. On the same day that Chalese's counsel was able to reach Dr.  
4 Paglini's assistant, counsel relayed the assistant's representations to Mr. Mayo and  
5 asked if he would stipulate to continue trial. *See* Letter to Mr. Mayo, dated June  
6 16, 2020, filed as **Exhibit "B."** In the letter, counsel noted that "Dr. Paglini still  
7 intends to conduct home visits, which leads us to believe that the report is not  
8 forthcoming anytime soon."

10       11. Later in the day on June 16, 2020, the court's JEA called Chalese's  
11 counsel's office and informed them that the Judge had decided to continue trial  
12 due to Covid-19 concerns and so that the parties could participate in a judicial  
13 settlement conference. *Nothing was mentioned to the JEA about Dr. Paglini's*  
14 *report or any desire on counsel's part to continue trial.* This phone call was  
15 initiated by the court and came as a surprise to Chalese's counsel. Counsel did not  
16 speak to court staff. The JEA's message was simply relayed by staff to counsel.

18       12. On June 17, 2020, the court's JEA emailed both counsel reflecting  
19 that trial was going to be continued because "Judge Moss would like the attorneys  
20 to reschedule the Judicial Settlement Conference if at all possible." *See Exhibit*  
21 *"A."*

22       13. On June 18, 2020, counsel was copied on a letter from Dr. Paglini to  
23 the court. *See* letter from Dr. Paglini, with emails attached, filed as **Exhibit "C."**  
24 In that letter, Dr. Paglini stated that he was having "difficulties contacting Ms.  
25  
26

1 Solinger within the last couple of weeks.” Dr. Paglini stated that he had emailed  
2 Chalese on June 8, 2020, and that she did not respond until June 16, 2020.

3 14. Chalese reports she had been playing phone tag with Dr. Paglini and  
4 was not trying to be difficult or unresponsive, and has been cooperating with him.

5 15. On June 19, 2020, Adam filed the instant motion accusing Chalese of  
6 being responsible for the Judge continuing trial and being “purposefully dilatory”  
7 with respect to Dr. Paglini’s evaluation.

8 16. Chalese was not the cause of Dr. Paglini’s request to continue the  
9 deadline for his report. When Dr. Paglini first emailed Chalese on June 8, 2020,  
10 he was trying to schedule additional interviews. Thus, it stands to reason that he  
11 would not have had a completed report by June 15, 2020, regardless of his in  
12 ability to communicate with Chalese. In fact, *in the email sent to Chalese by Dr.*  
13 *Paglini on June 8, 2020, his next available appointment was not until June 18,*  
14 *2020 – well after the anticipated June 15, 2020 due date for the report. See*  
15 *Exhibit “C.”* Chalese, as is shown in the emails, responded to Dr. Paglini prior  
16 to that date.

### 17 **C. LEGAL ARGUMENT**

18 First and foremost, it should be noted that Adam did not even make an  
19 attempt under EDCR 5.501 to resolve this issue before filing this motion.<sup>5</sup> Had  
20

21  
22  
23  
24 <sup>5</sup> This is the normal course of business for Adam and his counsel in this case. This week  
25 alone Mr. Mayo, on two occasions, contacted the court directly without any attempt to  
26 communicate with counsel before hand.

On the first occasion, despite having already obtained an OST, Mr. Mayo sent an  
improper email to the court asking if it could move up the hearing on Adam’s instant motion so

1 Adam's counsel had even a single discussion with Chalese's counsel about this,  
2 counsel could have re-affirmed to Adam's counsel that Chalese had nothing to do  
3 with trial being continued. Instead, Adam simply filed his motion making baseless  
4 accusations and libelous insinuations against Chalese and her counsel which are  
5 untrue and unfounded. There was absolutely no reason for this motion to have  
6 been filed.  
7

8         Second, district courts have the power and authority to manage their own  
9 docket, including scheduling trials. The United States is still in a pandemic. This is  
10 a fact clearly known to Adam, who has filed not one, but two different motions  
11 accusing Chalese of not following the Governor's directives during the pandemic.  
12 The court's JEA indicated in her email to counsel that the primary reason trial was  
13 being continued was due to a back-log in trials that had not been completed due to  
14 the shut-down.  
15

16         Additionally, the parties were scheduled to attend a judicial settlement  
17 conference on June 9, 2020, which was canceled because all judicial settlement  
18 conferences were cancelled until after July 1, 2020. The court's JEA also  
19 expressed the Judge was interested in counsel participating in such a settlement  
20 conference before trial.  
21

22  
23  
24 that it could be heard the next day. *See* email from Mr. Mayo to the court, dated June 24, 2020,  
filed as **Exhibit "D."**

25         On the second occasion, Mr. Mayo sent an email to the court asking if the court would  
26 continue OSC issues if the trial remains continued. *See* email from Mr. Mayo to the court, dated  
June 25, 2020, filed as **Exhibit "E."**

1 Chalese believes it is necessary for the child custody evaluation – which the  
2 court found would assist it in making a custody determination – to be completed  
3 well before trial proceeds. Dr. Paglini states that he began trying to reach Chalese  
4 on June 8, 2020. Attached to his letter, he includes an email showing that his first  
5 availability was June 18, 2020. Thus, even if Chalese had responded to him the  
6 same day, Dr. Paglini could not have completed his report by the anticipated  
7 deadline of June 15, 2020.

9 It appears the sole purpose of Adam’s motion is to bad-mouth Chalese. The  
10 court moved trial before it had received any word from Dr. Paglini or Dr. Paglini’s  
11 report. *The court moved trial for reasons having absolutely nothing to do with*  
12 *Chalese.*

14 Furthermore, Adam appears to insinuate that Chalese’s counsel engaged in  
15 some sort of ex-parte communication with the court, and that the court responded  
16 to said ex-parte communication. The court knows full well this is untrue. While  
17 Chalese’s counsel did reach out to Adam’s counsel about Dr. Paglini’s overdue  
18 report and continuing trial (to which, it should be noted, counsel never received a  
19 response), this fact was not communicated to the court, at least not by Chalese, her  
20 counsel or her counsel’s staff. The court chose to continue the trial for its own  
21 reasons.  
22

24 Finally, Adam requests findings that Chalese engaged in “dilatory  
25 behavior” in regard to the evaluation. Such a finding by the court would be  
26

1 completely baseless. We have no idea how long it took Adam to respond to Dr.  
2 Paglini's emails. We have no idea how long it took Adam to schedule  
3 appointments and home visits. Moreover, it can be reasonably assumed that Dr.  
4 Paglini did not request an additional five weeks to complete his report because  
5 Chalese took one week to respond to an email.  
6

7 There is no basis for a finding against Chalese. Adam's motion was  
8 completely uncalled for, Chalese had nothing to do with the court's decision to  
9 continue trial, and his motion must be denied.  
10

## 11 **II. COUNTERMOTION**

### 12 **A. ADAM SHOULD BE ORDERED TO FILE AN UPDATED FDF** 13 **IMMEDIATELY.**

14 Adam represented to the court on February 26, 2020 that he voluntarily took  
15 a job that decreased his salary from \$120,000.00 per year to \$85,000.00 per year.  
16 Based on that representation, the court decreased Adam's temporary spousal  
17 support obligation from \$1,125.00 per month to \$800.00 per month,  
18 commensurate with his represented decrease in income.  
19

20 Adam stated in court that he would begin his new job, and his income  
21 would decrease, as of March 16, 2020. Now, over three months later, Adam has  
22 still not filed an updated FDF, produced updated paystubs, or disclosed any other  
23 documentation to support that he has had a decrease in income.  
24  
25  
26

1 NRCP 16.2(d)(3)(N) obligates a party to provide “proof of income from all  
2 sources” as part of mandatory disclosures, and subsection (3)(f) obligates a party  
3 to make “additional or amended disclosures whenever new or different  
4 information is discovered or revealed ... not more than 14 days after the party  
5 acquires additional information[.]” Further, the court’s minutes from the June 1,  
6 2020 hearing note that the parties are required to file updated FDFs prior to trial if  
7 there are changes since the filing of the last FDF.  
8

9 Adam’s last FDF was filed nine months ago, in September 2019. With trial  
10 getting continued, Chalese asks that the court order Adam to immediately file an  
11 updated FDF with updated paystubs to support his representation as to his  
12 decreased income. Discovery is closed, and Chalese cannot adequately prepare for  
13 trial if she does not know where Adam works, when Adam works, or how much  
14 he earns.  
15

16 Chalese returned to work around May 20, 2020, and filed an updated FDF  
17 on May 26, 2020. Chalese received a \$0.50 raise, which is reflected on her FDF,  
18 but her income is still under \$2,000.00 per month, excluding spousal support. It is  
19 believed Adam’s income is still four times higher than Chalese’s. Her year-to-date  
20 pay as of May 20, 2020 was only a little over \$4,000.00 – less than \$1,000.00 per  
21 month. Further, while Chalese was forced to stop working during the shut-down, it  
22 is believed Adam was able to work from home during that period.  
23  
24  
25  
26

1 **B. THE COURT SHOULD CLARIFY THE PARTIES' OBLIGATIONS**  
2 **REGARDING RIGHT OF FIRST REFUSAL AND CHILD**  
3 **EXCHANGES.**

4 NRS 125C.0045(1)(a), the court may make or modify orders involving  
5 minor children as appears in their best interests at any time during their minority.  
6 At the June 17, 2019 hearing, this Court stated on the record, while addressing  
7 Chalese, "You must give Dad first rights *and vice versa*" (emphasis added).<sup>6</sup>  
8 When the order, drafted by Adam's counsel and not signed off on by Chalese's,  
9 was entered, however, it stated only, "Father shall have first right of refusal."<sup>7</sup> The  
10 order does not delineate a period of time after which the right of first refusal  
11 would apply.  
12

13 This order has been causing conflict between the parties. For example, even  
14 though the court clearly anticipated that the children would go to daycare, Adam  
15 has recently insisted that Chalese must drop the children off to him during her  
16 working hours and not at daycare because of his "right of first refusal." Chalese  
17 agreed to do so if Adam provided his work information and hours and if Adam  
18 picked the children up. It has been Adam's position that Chalese *must* drop the  
19 children off to him instead of at daycare and that Chalese must both drop the  
20 children off to Adam's home as well as pick them up.  
21  
22

---

23  
24 <sup>6</sup> See June 17, 2019 Video Transcript at Time Index 12:18:48.

25 <sup>7</sup> See Order after Hearing of June 17, 2019, filed August 21, 2019, at page 4, line 19.  
26



1 Chalese believes that Adam leaves the children with his girlfriend or her  
2 daughter often, and does not offer the children to Chalese when he is unavailable  
3 to watch them. Chalese does not even know when Adam is and is not with the  
4 children because he will not disclose his work schedule. Chalese would like the  
5 court to clarify whether the right of first refusal applies to both parties, as the court  
6 indicated at the hearing, or if only Adam has the right, as his attorney drafted the  
7 order.  
8

9 There is a court order in place that prohibits Josh from watching the  
10 children in Chalese's absence, and Chalese's parents live in Florida. As such, the  
11 only people who Chalese can have regularly provide care for the children during  
12 her custodial time is their daycare. She respectfully posits that she does not  
13 believe the right of first refusal is necessary.  
14

15 There has been additional conflict regarding transportation and child  
16 exchanges. After Chalese returned to work, Adam stated that he wanted the  
17 children during Chalese's work hours because he did not want them to go back to  
18 daycare. Chalese agreed and suggested that the parties find a location between  
19 their two homes in which to exchange the children.  
20

21 In response, Adam cited the June 17, 2019 order and insisted that he must  
22 pick the children up from Chalese's home. Chalese agreed. On June 22, 2020,  
23 Adam did a total about-face, and demanded that Chalese drop the children off to  
24 his home before work and pick the children up from his home after work.  
25  
26

1 Chalese feels as though Adam is now trying to bait her into violating the  
2 order. The June 17, 2019 order states, “Receiving parent shall pick up.”<sup>8</sup> Chalese  
3 requests confirmation or clarification of this order as to whether it applies to to  
4 right of first refusal situation – she believes it should.

5  
6 **C. CHALESE SHOULD BE AWARDED HER ATTORNEY’S FEES.**

7 EDCR 5.501(c) states that “[f]ailure to comply with this rule may result in  
8 imposition of sanctions if the court concludes that the issues would have been  
9 resolved if an attempt at resolution had been made before filing.” EDCR 7.60(b)  
10 allows for sanctions when a party “[s]o multiplies the proceedings in a case as to  
11 increase costs unreasonably and vexatiously,” “[f]ails or refuses to comply with  
12 these rules,” or “[f]ails or refuses to comply with any order of a judge of the  
13 court.” Finally, NRS 18.010 allows for attorney’s fees to a prevailing party when a  
14 claim “was brought or maintained without reasonable ground or to harass the  
15 prevailing party.”  
16

17  
18 The sole purpose of Adam’s motion is to harass Chalese. He failed to make  
19 any attempt to resolve before filing it. It is unclear what relief Adam even seeks,  
20 but it is clear that he blames Chalese for trial being continued and implies that  
21 something improper occurred. Chalese made no request of the court to continue  
22 trial and the court continued trial, to counsel’s knowledge, before receiving any  
23 communication with Dr. Paglini. Further, Chalese’s counsel contacted Dr. Paglini  
24

25 

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<sup>8</sup> See *Id.* at page 5, line 6.  
26

1 on *three occasions* and was never told there was any issue with communicating  
2 with Chalese. Chalese has been participating in the evaluation, and does not  
3 believe Dr. Paglini would have completed the report on time regardless of whether  
4 she called him back on June 8, 2020 or not.  
5

6 Awards of attorney's fees are within the sound discretion of the district  
7 court. *Fletcher v. Fletcher*, 89 Nev. 540, 516 P.2d 103 (1973); *Levy v. Levy*, 96  
8 Nev. 902, 620 P.2d 860 (1980); *Hybarger v. Hybarger*, 103 Nev. 255, 737 P.2d  
9 889 (1987).

10 When an attorney in a family law case requests fees, the Court must  
11 consider several factors in determining the reasonable value of the services  
12 provided. *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31  
13 (1969). Those factors, referred to as the *Brunzell* factors, are: (1) *The Qualities of*  
14 *the Advocate*: to include ability, training, education, experience, professional  
15 standing and skill; (2) *The Character of the Work to Be Done*: to include the  
16 difficulty importance, time and skill required, the responsibility imposed and the  
17 prominence and character of the parties where they affect the importance of the  
18 litigation; (3) *The Work Actually Performed by the Lawyer*: to include the actual  
19 skill, time and attention given to the work; and (4) *The Result Obtained*: whether  
20 the attorney was successful and what benefits were derived. *Id.* The court should  
21 give equal weight to each of the *Brunzell* factors. *Miller v. Wilfong*, 121 Nev. 119  
22 (2005).  
23  
24  
25  
26

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

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

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

15 b. **Alicia S. Exley, Esq.:** Ms. Exley is well-qualified and a member in  
16 good standing of the State Bar of Nevada. Ms. Exley worked for a family  
17 law attorney for four years prior to graduating from law school, passing the  
18 Bar Exam, and being admitted as a Nevada attorney. Ms. Exley has been  
19 practicing primarily in the field of family law for the last three years. She  
20 serves on the Community Service Committee of the Clark County Bar  
21 Association, earning her Committee Circle of Support Awards for 2018 and  
22 2019. She was also named a “Best Up & Coming Attorney” by Nevada  
23 Business Magazine in 2018. Ms. Exley has spoken about QDROs as part of  
24  
25  
26

1 the Downtown Cultural Series and had an article on economic abuse in  
2 divorce litigation published in the *Nevada Lawyer* in 2019.

3 c. **Angela Romero:** Ms. Romero has been working in the private sector  
4 as a family law paralegal since 2002, and currently holds a Bachelor of  
5 Science in Business Administration. Ms. Romero joined Pecos Law Group  
6 in 2017, and with more than 18 years of family law experience, she  
7 contributed knowledgeable and competent service on this case.  
8

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

11 3. With regard to the *Work Actually Performed by the Attorney*,  
12 Chalese's attorneys were well-prepared for the case. Through the course of this  
13 litigation, Counsel prepared procedurally proper pleadings and prepared for the  
14 hearing with skill, time, and attention.  
15

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

19 Counsel will submit applicable billings for the Court's assessment of its  
20 attorney's fees award as the Court directs.  
21

### 22 **III. CONCLUSION**

23 WHEREFORE, based on the foregoing, Defendant **Chalese Marie**  
24 **Solinger** respectfully requests that this court enter orders granting her the  
25 following relief:  
26

1. Denying Plaintiff's *Motion to Address Upcoming Trial Date and Findings in Regard to Chalese's Refusal to Timely Facilitate the Completion of the Child Custody Evaluation*;

2. Ordering Plaintiff to file an updated FDF;

3. A clarification on the right of first refusal and child exchanges;

4. Awarding Defendant her attorney's fees; and

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

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

PECOS LAW GROUP

*[Handwritten signature]*

**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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I have read the opposition and counter motion and hereby certify that the facts set forth therein are true of my own personal knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true. I incorporate those facts into this Declaration as though fully set forth herein.

DATED this 26 day of June, 2020.

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1. I am an attorney duly licensed to practice in the State of Nevada. I am one of the attorneys for Defendant Chalese Solinger in this matter.

3. On June 15, 2020, I called Dr. Paglini's office a second time to inquire as to whether the custody evaluation was completed. I left a second message with his assistant, but did not receive a call back that day.

5. Based on the representations of Dr. Paglini's assistant that made it sound unlikely a report would be completed by trial, I sent a letter to Mr. Mayo



1 outlining my conversation with Dr. Paglini's assistant and asking if he would  
2 stipulate to continue trial.

3           6.     Later that day, I received an email from our paralegal, Angela  
4 Romero, stating that she had received a call from the court's JEA, who informed  
5 her the Judge was continuing the trial date. I had no personal contact with the  
6 department about this and, to my knowledge, our office made no requests, or even  
7 mention, that the trial would need to be continued due to not having a completed  
8 custody evaluation.  
9

10           7.     On June 17, 2020, both counsel received an email from the JEA  
11 stating the trial was not going forward and that the Judge wanted the parties to  
12 engage in a settlement conference.  
13

14           8.     On June 18, 2020, Dr. Paglini sent a letter to court requesting an  
15 additional five weeks for his report and citing issues getting ahold of Chalese  
16 between June 8, 2020 and June 16, 2020.  
17

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

9. Neither I nor Mr. Fleeman had any ex-parte communication with the Judge regarding a request to continue trial. It appears the court continued trial for reasons unrelated to Dr. Paglini or Chalese.

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

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

**Alicia S. Exley, Esq.**

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**Angela Romero** under penalties of perjury, states as follows:

1. I am a paralegal for PECOS LAW GROUP, who represents Defendant  
 re Solinger. I have been assisting Mr. Fleeman and Ms. Exley with his  
 .

2. On June 16, 2020, I received an email from Suzanna Zavala asking  
call her. I called her right away.

3. Ms. Zavala informed me that she had just spoken with Mr. Mayo's  
and wanted to inform our office, that the Judge was going to have to  
ue the trial in this matter.

4. Ms. Zavala indicated that she wanted to inform us right away, as she had already spoken with Mr. Mayo and she did not want our client to find out about it through Adam before we knew.

5. Ms. Zavala explained that because of the pandemic and the current Administrative Orders, the Judge wanted to prioritize hearing trials she had started, which meant the Solinger trial would need to be continued. Ms. indicated she did not yet have an anticipated date as to when it would need to be continued.

6. I then asked Ms. Zavala, to clarify that “this call is not to ask if we  
 ay with the continuance, rather, it is for you to inform us that this trial is  
 to be continued?” Ms. Zavala indicated that was correct, and that the trial

1 was going to be continued. I thanked her for the information and told her I would  
2 let Mr. Fleeman and Ms. Exley know.

3 7. At no time did I mention to Ms. Zavala the custody evaluation or that  
4 we had made a request to Mr. Mayo to continue the trial. It is my understanding,  
5 based on my conversation with Ms. Zavala, that the Judge continued trial based  
6 upon her own trial schedule and calendar, not because of anything having to do  
7 with Chalese or Dr. Paglini.  
8

9 I declare under penalty of perjury that the foregoing is true and  
10 correct.  
11

12 DATED this 26<sup>th</sup> day of June, 2020.

13  
14   
Angela Romero

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 26<sup>th</sup> day of June, 2020, I served a copy of  
4 *Opposition to Motion to Address Upcoming Trial Date and Findings in Regard to*  
5 *Chalese's Refusal to Timely Facilitate the Completion of the Child Custody*  
6 *Evaluation and Countermotion for Plaintiff to File an Updated FDF, for*  
7 *Attorney's Fees, and Related Relief*, as follows:

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

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

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

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

15 Vincent Mayo

VMGroup@TheAbramsLawFirm.com

16 admin email

email@pecoslawgroup.com

17 Jack Fleeman


jack@pecoslawgroup.com

18 Angela Romero

angela@pecoslawgroup.com

19 Alicia Exley

alicia@pecoslawgroup.com

20   
21 \_\_\_\_\_  
22 ALICIA EXLEY,  
23 An employee of PECOS LAW GROUP  
24  
25  
26



MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam Solinger  
Plaintiff/Petitioner  
v.  
Anaiese Solinger  
Defendant/Respondent

Case No. D-19-362295-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:

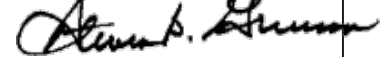
☒ **\$0** ☐ **\$25** ☐ **\$57** ☐ **\$82** ☐ **\$129** ☐ **\$154**

Party filing Motion/Opposition: Defendant Date 6/26/2023

Signature of Party or Preparer

[Signature]

002417



EXHS  
**Jack W. Fleeman, Esq.**  
Nevada Bar No. 10584  
**Alicia S. Exley, Esq.**  
Nevada Bar No. 14192  
PECOS LAW GROUP  
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[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: **June 30, 2020**

Time of Hearing: **11:15 a.m.**

**EXHIBITS TO**  
**OPPOSITION TO MOTION TO ADDRESS UPCOMING TRIAL DATE AND FINDINGS**  
**IN REGARD TO CHALESE'S REFUSAL TO TIMELY FACILITATE THE**  
**COMPLETION OF THE CHILD CUSTODY EVALUATION**  
**AND**  
**COUNTERMOTION FOR PLAINTIFF TO FILE AN UPDATED FDF,**  
**FOR ATTORNEY'S FEES, AND RELATED RELIEF**

EXHIBIT A:	Email from Ms. Zavala to counsel dated June 17, 2020	DEF001418
EXHIBIT B:	Letter from Ms. Exley to Mr. Mayo dated June 16, 2020	DEF001419
EXHIBIT C:	Letter from Dr. Paglini to Department I dated	DEF001420-

1		June 18, 2020, including attached emails	DEF001424
2	EXHIBIT D:	Email from Mr. Mayo to Ms. Zavala dated June 24, 2020	DEF001425
3	EXHIBIT E:	Email from Mr. Mayo to Ms. Zavala dated June 25, 2020	DEF001426

5  
6 DATED this 26<sup>th</sup> day of June, 2020.

7 PECOS LAW GROUP

8  
9  
10 

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

12 Nevada Bar No. 10584

13 **Alicia S. Exley, Esq.**

14 Nevada Bar No. 14192

15 8925 South Pecos Road, Suite 14A

16 Henderson, Nevada 89074

17 Attorneys for Defendant



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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 26<sup>th</sup> day of June, 2020, I served a copy of "*Exhibits to Opposition to Motion to Address Upcoming Trial Date and Findings in Regard to Chalese's Refusal to Timely Facilitate the Completion of the Child Custody Evaluation and Countermotion for Plaintiff to File an Updated FDF, for Attorney's Fees, and Related Relief*" as follows:

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

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

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

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

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



ALICIA EXLEY,  
An employee of PECOS LAW GROUP

# **EXHIBIT A**

## Alicia Exley

---

**From:** Zavala, Azucena <ZavalaA@clarkcountycourts.us>  
**Sent:** Wednesday, June 17, 2020 11:45 AM  
**To:** VMGroup; Vincent Mayo (vmayo@tamlf.com); Jack Fleeman; Alicia Exley  
**Cc:** Angela Romero  
**Subject:** FW: Solinger vs. Chalese Solinger D582245

Good Morning Counsel,

This email is to let you know that the Non-Jury Trial currently set for June 30, 2020, July 1, 2020 and July 2, 2020 is not going forward.

Judge Moss would like the attorneys to reschedule the Judicial Settlement Conference if at all possible. Please let us know if Counsel wants to do that.

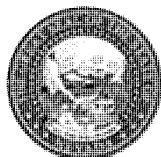
Unfortunately, due to COVID-19 most of the Trials/Evidentiary Hearings were continued 3 to 4 months out and now we need to reschedule them before the end of the year. Judge Moss wants to prioritize and set the Trials/Evidentiary Hearings that she has started and finish them first.

Counsel will be contacted and we will reschedule the Trial in this matter as soon as we have new dates and times.

We apologize for any inconvenience.

Please let us know if you have any other questions.

Thank you,



SUZANNA ZAVALA  
Judicial Executive Assistant  
to the Honorable Cheryl B. Moss  
Eighth Judicial District Court  
Family Court, Dept. I  
601 North Pecos Road  
Las Vegas, NV 89101  
702.455-1887 | [zavalaA@clarkcountycourts.us](mailto:zavalaA@clarkcountycourts.us)

# **EXHIBIT B**

ELECTRONICALLY SERVED  
6/16/2020 3:32 PM

Attorneys

Bruce I. Shapiro  
Paul A. Lemcke  
Shann D. Winesett\*  
Jack W. Fleeman  
Curtis R. Rawlings  
Jennifer Poynter-Willis  
Carli L. Sansone  
Alicia S. Exley

\*Also Licensed in California

Kirby Wells  
Of Counsel

## PECOS LAW GROUP

*A Professional Law Corporation*  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Telephone (702) 388-1851  
Facsimile (702) 388-7406  
Email: Email@PecosLawGroup.com

Legal Assistants

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

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

June 16, 2020

Via E-Service

**Vincent Mayo, Esq.**

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

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

Dear Vince:

We contacted Dr. Paglini's office to ask about the status of the custody evaluation report. They told us that there is no estimated date by which they expect the report to be completed, and while they will try to get it done before trial, they cannot guarantee anything. They also indicated that Dr. Paglini still intends to conduct home visits, which leads us to believe that the report is not forthcoming anytime soon.

Will you stipulate to continue the trial until after we have received the report and had time to conduct any necessary depositions and follow-up? We do not see how we can proceed as scheduled, as much of the case and preparation for trial may hinge on that report.

Please provide us with a response by Thursday, June 18, 2020, or we will need to file a motion to continue and seek an order shortening time.

Sincerely,

/s/ Alicia S. Exley, Esq.

**Alicia S. Exley, Esq.**

cc : Chalese Solinger

DEF001419

Case Number: D-19-582245-D

002424

# **EXHIBIT C**

*John Paglini, Psy.D.*

Licensed Psychologist  
9163 West Flamingo, Suite 120  
Las Vegas, Nevada 89147

**Phone: (702) 869-9188**

**Fax: (702) 869-9203**

June 18, 2020

Honorable Judge Moss  
Department I  
Eighth Judicial District Court  
Family Division  
601 N. Pecos Street  
Las Vegas, NV 89101  
Deptilc@clarkcountycourts.us

RE: Solinger v. Solinger Case# D-19-582245-D

Dear Judge Moss,

This is to provide an update on the Solinger vs. Solinger case. I will need a five week extension on this case. Mr. Adam Solinger has been exceptionally cooperative throughout the process. Additionally, Ms. Chalese Solinger has been cooperative. However, I have had difficulties contacting Ms. Solinger within the last couple of weeks. Enclosed are some emails between my office and Ms. Chalese Solinger.

On June 8, 2020, my office emailed Ms. Solinger to schedule times for an interview. My secretary also tried to leave a phone message with Ms. Solinger on the same day, but her phone is not set up for voicemail and our call was terminated. My secretary tried to contact Ms. Solinger via phone on June 15, 2020 and once again a message could not be left because the phone call was terminated. An email was sent to Ms. Solinger the same day at 2:09pm. Ms. Solinger was advised that a previous email was sent on June 8<sup>th</sup> regarding scheduling her next interview, conducting a collateral interview of her partner, and also a home visit. Ms. Solinger responded at 2:44pm on June 16, 2020. She stated work has been crazy since the reopening and she did not receive a prior email and asked for our availability. On June 16, 2020, my secretary sent a reply to Ms. Solinger providing interview dates. Dr. Paglini tried to call Ms. Solinger in the afternoon of June 17, 2020, and the call was terminated.

As of Thursday, June 18, 2020, at 2:30pm we still have not heard back from Ms. Solinger. This letter is to advise the courts I am requesting a five week extension to complete the evaluation.

Respectfully submitted,



John Paglini, Psy.D.

JPmc: 06/18/2020

CC via email:

Attorney Mayo: vmayo@theabramslawfirm.com

Attorney Exley: alicia@pecoslawgroup.com

DEF001420

002426



Paglini Office <paglini.office@gmail.com>

---

## Appointment

---

**Paglini Office** <paglini.office@gmail.com>

Mon, Jun 8, 2020 at 12:46 PM

To: Chalese Solinger <curlyfriez09@gmail.com>

Good afternoon,

Dr. Paglini would like to schedule his next session with you. If you're happy to come into the office that is fine, or I can schedule for a video call via Doxy. It is entirely up to you.

Dr. Paglini's availability is as follows:

June 18th - at 12:00pm

June 19th at 12pm

June 22nd at 1pm

June 24th at 9am or at 1pm

Please let me know if one of these dates and times works for you.

Many thanks

Michelle

DEF001421

002427





Paglini Office <paglini.office@gmail.com>

---

## Scheduling next appointment

---

**Paglini Office** <paglini.office@gmail.com>

Mon, Jun 15, 2020 at 2:09 PM

To: Chalese Solinger <curlyfriez09@gmail.com>

Good afternoon,

I tried to call this morning but was unable to leave a voicemail. I'm unsure if you received my previous email sent on June 8th, but I was hoping to with you regarding scheduling some appointments. Dr. Paglini would like to interview you, conduct a collateral interview of your partner, and also conduct a home visit.

If you could please contact our office as soon as possible so we can start to schedule the above it would be greatly appreciated.

Kind regards  
Michelle

DEF001422

002428



Paglini Office <paglini.office@gmail.com>

---

## Scheduling next appointment

---

curlyfriez09@gmail.com <curlyfriez09@gmail.com>  
To: Paglini Office <paglini.office@gmail.com>

Tue, Jun 16, 2020 at 2:44 PM

So sorry, work has has been crazy since reopening. I didn't receive an email prior this one. What is his availability?

-Chalese Solinger

> On Jun 15, 2020, at 2:10 PM, Paglini Office <paglini.office@gmail.com> wrote:

>

>

[Quoted text hidden]

DEF001423

002429



Paglini Office <paglini.office@gmail.com>

---

## Scheduling next appointment

---

**Paglini Office** <paglini.office@gmail.com>  
To: Chalese Solinger <curlyfriez09@gmail.com>

Tue, Jun 16, 2020 at 3:01 PM

That's okay, I completely understand. Just was not sure that you were receiving my calls and emails so thought I would keep trying.

I have availability on Friday June 19th at 9am  
Monday June 22nd at 1pm  
Tuesday June 23rd at 12pm  
Wednesday June 24th at 9am  
Thursday June 24th at 9am

For a home visit Dr. Paglini prefers to conduct these on a day you would have the children, as such please let me know what your visitation schedule is and I can try to work around this.

Thanks  
Michelle  
[Quoted text hidden]

DEF001424

002430

# EXHIBIT D

**Alicia Exley**

---

**From:** Vincent Mayo <vmayo@tamlf.com>  
**Sent:** Wednesday, June 24, 2020 2:56 PM  
**To:** Zavala, Azucena; Alicia Exley  
**Cc:** Vincent Mayo  
**Subject:** Solinger

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

---

PERSONAL AND CONFIDENTIAL

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The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

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Hello,

My client wanted to know if his motion regarding the trial set to be heard next Tuesday could be heard tomorrow morning? I assume that would require an additional OST request, meaning we would not be able to have it heard tomorrow. Please confirm.

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 E**

## Alicia Exley

---

**From:** Vincent Mayo <vmayo@tamlf.com>  
**Sent:** Thursday, June 25, 2020 8:06 AM  
**To:** Zavala, Azucena; Alicia Exley  
**Cc:** Julie Schoen  
**Subject:** Solinger

**Importance:** High

---

### PERSONAL AND CONFIDENTIAL

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

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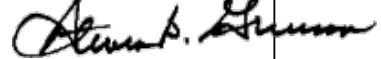
Good morning Ms. Zavala,

I have a question: The Court ordered at the last hearing that Chalese's motion to hold Adam in contempt would be addressed at the time of trial as part of the trial (with Chalese presenting evidence during the trial based on an Order to Show Cause and Adam presenting evidence to oppose it. The same would apply to our request to hold Chalese in contempt). However, trial was supposed to be next week. Because of this, we did not file an Opposition to the Motion as we would instead present evidence at trial in opposition to Chalese's claim. If trial remains continued, I assume the OSC component for both sides also be continued. Is that correct?

Sorry to address the matter this way but I want to make sure I know and plan accordingly.

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)



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 REGARDING ORDERS TO SHOW**  
15 **CAUSE**

16 **IT IS HEREBY STIPULATED AND AGREED** by ALICIA S.  
17 EXLEY, ESQ., attorney for Defendant, CHALESE MARIE SOLINGER  
18 (hereinafter referred to as "Chalese"), and VINCENT MAYO, ESQ.,  
19 attorney for Plaintiff, ADAM MICHAEL SOLINGER (hereinafter  
20 referred to as "Adam"), in the above-entitled matter, that each party's  
21 pending Orders to Show Cause / pending claims to hold either party in



1 contempt of court shall be continued to the date of the continued trial,  
2 which has not yet been set. Therefore, counsel for each party waive any  
3 formal notice requirements for the Orders to Show Cause that have  
4 already been addressed by the Court.

5 Respectfully Submitted:

Approved as to form and content:

6 THE ABRAMS & MAYO LAW  
7 FIRM

PECOS LAW GROUP

8 /s/ Vincent Mayo, Esq.

/s/ Alicia S. Exley, Esq.

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

Alicia S. Exley, Esq.  
Nevada State Bar Number: 14192  
8925 South Pecos Rd.,  
Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant

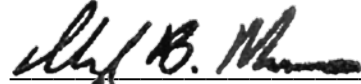
1 Adam M. Solinger v. Chalese M. Solinger  
2 *Stipulation and Order Regarding Orders to Show Cause*  
Case Number: D-19-582245-D

3 **ORDER**

4 **THEREFORE**, based upon the stipulation of the parties and for  
5 good cause,

6 **IT IS HEREBY ORDERED SO ORDERED.**

7 Dated this 29 day of JUNE, 2020.

8 

DISTRICT COURT JUDGE @

9 Respectfully Submitted:

10 THE ABRAMS & MAYO LAW FIRM

11 /s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

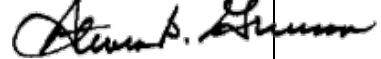
12 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

13 Las Vegas, Nevada 89118

Tel: (702) 222-4021

14 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 THE STIPULATION AND ORDER**  
20 **REGARDING THE ORDERS TO SHOW CAUSE**

21 PLEASE TAKE NOTICE that the Stipulation and Order Regarding  
22 the Orders to Show Cause was duly entered in the above-referenced  
23 matter. A true and correct copy of said

24 ///

///

///

1 Stipulation and Order is attached hereto.

2 DATED Monday, June 29, 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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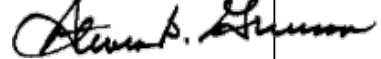
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Entry of Stipulation and Order Regarding Orders to Show Cause* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Monday, June 29, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Alicia Exley, 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 REGARDING ORDERS TO SHOW**  
15 **CAUSE**

16 **IT IS HEREBY STIPULATED AND AGREED** by ALICIA S.  
17 EXLEY, ESQ., attorney for Defendant, CHALESE MARIE SOLINGER  
18 (hereinafter referred to as "Chalese"), and VINCENT MAYO, ESQ.,  
19 attorney for Plaintiff, ADAM MICHAEL SOLINGER (hereinafter  
20 referred to as "Adam"), in the above-entitled matter, that each party's  
21 pending Orders to Show Cause / pending claims to hold either party in

1 contempt of court shall be continued to the date of the continued trial,  
2 which has not yet been set. Therefore, counsel for each party waive any  
3 formal notice requirements for the Orders to Show Cause that have  
4 already been addressed by the Court.

5 Respectfully Submitted:

Approved as to form and content:

6 THE ABRAMS & MAYO LAW  
7 FIRM

PECOS LAW GROUP

8 /s/ Vincent Mayo, Esq.

/s/ Alicia S. Exley, Esq.

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

Alicia S. Exley, Esq.  
Nevada State Bar Number: 14192  
8925 South Pecos Rd.,  
Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant

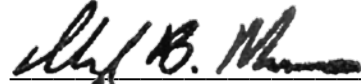
1 Adam M. Solinger v. Chalese M. Solinger  
2 *Stipulation and Order Regarding Orders to Show Cause*  
Case Number: D-19-582245-D

3 **ORDER**

4 **THEREFORE**, based upon the stipulation of the parties and for  
5 good cause,

6 **IT IS HEREBY ORDERED SO ORDERED.**

7 Dated this 29 day of JUNE, 2020.

8 

DISTRICT COURT JUDGE @

9 Respectfully Submitted:

10 THE ABRAMS & MAYO LAW FIRM

11 /s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

12 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

13 Las Vegas, Nevada 89118

Tel: (702) 222-4021

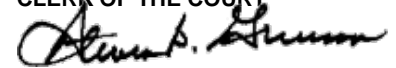
14 Attorney for Plaintiff



**FDF**

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

Electronically Filed  
 6/30/2020 11:01 AM  
 Steven D. Grierson  
 CLERK OF THE COURT



Eighth Judicial District Court  
 Family Division  
 Clark County, Nevada

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

**GENERAL FINANCIAL DISCLOSURE FORM**

**A. Personal Information:**

1. What is your full name? (*first, middle, last*) ADAM MICHAEL SOLINGER
2. How old are you? 31
3. What is your date of birth? 07/01/1988
4. What is your highest level of education? Law School

**B. Employment Information:**

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

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
March 2020	Confidential	Attorney	Flexible	Flexible

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

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

Prior Employer: Las Vegas Defense Group Date of Hire: June 2015 Date of Termination: March 15, 2020  
 Reason for Leaving: Took a new position with better benefits and less demanding hours

## Monthly Personal Income Schedule

### A. Year-to-date Income.

As of the pay period ending May 31, 2020, my gross year to date pay is \$17,996.00.

### B. Determine your Gross Monthly Income.

Hourly Wage

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

Annual Salary

\$85,072	÷	12 Months	=	\$7,089.33
Annual Income				Gross Monthly Income

### C. Other Sources of Income.

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

<b>Total Average Gross Monthly Income (add totals from B and C above)</b>	<b>\$7,089.33</b>
---	-------------------

## D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	
2.	Federal Health Savings Plan	
3.	Federal Income Tax	\$608.60
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): _____	\$179.77
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	\$100.19
7.	Retirement, Pension, IRA, or 401(k)	
8.	Savings	
9.	Social Security	
10.	Union Dues	
11.	Other: (Type of Deduction)	
Total Monthly Deductions (Lines 1-11)		\$888.56

## Business/Self-Employment Income & Expense Schedule

### A. Business Income:

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

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

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

### Personal Expense Schedule (Monthly)

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

Expense	Monthly Amount I Pay	For Me <input type="checkbox"/>	Other Party <input type="checkbox"/>	For Both <input type="checkbox"/>
Alimony/Spousal Support				
Auto Insurance				
Car Loan/Lease Payment				
Cell Phone				
Child Support/Familial Support	800.00		X	
Clothing, Shoes, Etc...	150.00	X		
Credit Card Payments (minimum due)	250.00	X		
Dry Cleaning	20.00	X		
Electric	400.00	X		
Food (groceries & restaurants)	750.00	X		
Fuel	200.00	X		
Gas (for home)	124.82	X		
Health Insurance (not deducted from pay)				
HOA				
Home Insurance (if not included in mortgage)	75.00	X		
Home Phone				
Internet/Cable	175.00	X		
Lawn Care				
Membership Fees	20.00	X		
Mortgage/Rent/Lease	1,500.00	X		
Pest Control				
Pets	80.00	X		
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer				
Student Loans				
Unreimbursed Medical Expense	60.00	X		
Water				
Other:				
Child expenses from page 5	2,641.00			
<b>Total Monthly Expenses</b>	<b>7245.82</b>			

### Household Information

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

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

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

**\*Childcare is not being paid while the children aren't going to school through the pandemic but will resume.**

Type of Expense	1 <sup>st</sup> Child	2 <sup>nd</sup> Child	3 <sup>rd</sup> Child	4 <sup>th</sup> Child
Cellular Phone				
Child Care*	1,200.00	961.00		
Clothing	100.00	100.00		
Education				
Entertainment	20.00	20.00		
Extracurricular & Sports	40.00			
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation				
Unreimbursed Medical Expenses	100.00	100.00		
Vehicle				
Other:				
<b>Total Monthly Expenses</b>	<b>1,460.00</b>	<b>1,181.00</b>		

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

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
Jessica Sellers	37	Significant Other	2700

### Personal Asset and Debt Chart

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

Line	Description of Asset and Debt Thereon	Gross Value		Total Amount Owed		Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Proceeds from Marital Residence	\$ 168,000	-	\$ 0	=	\$ 168,000	Both
2.	2017 Moto Guzzi Café Racer VIII	\$ 5,000	-	\$ 0	=	\$ 5,000	Adam
3.	Forest River Travel Trailer	\$ 5,000	-	\$ 0	=	\$ 5,000	Both
4.	Bank of America, checking	\$ 5,597.97	-	\$ 0	=	\$ 5,597.97	Adam
5.	Art collection	\$ Unknown	-	\$ 0	=	\$ Unknown	Adam/Both
6.	Roth 401k	\$ 36,436.87	-	\$ 0	=	\$ 36,436.87	Adam
7.	Charles Schwab	\$ Unknown	-	\$ Unknown	=	\$ Unknown	Chalese
8.	Firearms	\$ 7,500	-	\$ 0	=	\$ 7,500	Adam/Both
9.		\$	-	\$	=	\$	
10.		\$	-	\$	=	\$	
11.		\$	-	\$	=	\$	
12.		\$	-	\$	=	\$	
13.		\$	-	\$	=	\$	
14.		\$	-	\$	=	\$	
15.		\$	-	\$	=	\$	
<b>Total Value of Assets (add lines 1-15)</b>		\$ 227,534.84	-	\$	=	\$ 22,7534.84	

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

Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Bank of America credit card	\$ 1,282.89	Adam
2.	Capital One credit card	\$ Unknown	Chalese
3.		\$	
4.		\$	
5.		\$	
6.		\$	
<b>Total Unsecured Debt (add lines 1-6)</b>		\$ 1,282.89	

## CERTIFICATION

**Attorney Information:** *Complete the following sentences:*

1. I have retained an attorney for this case.
2. As of the date of today, the attorney has been paid a total of \$ 185,558.31 on my behalf.
3. I have a credit with my attorney in the amount of \$ 5,000.00.
4. I currently owe my attorney a total of \$ 2,992.50.
5. I owe my prior attorney a total of \$ N/A.

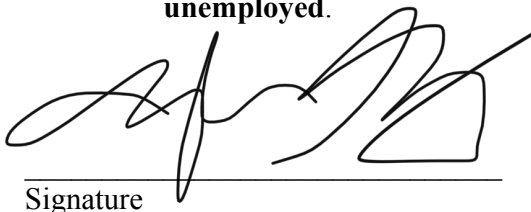
**IMPORTANT:** Read the following paragraphs carefully and initial each one.

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

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

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

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

  
Signature

**6/30/2020**  
Date

## CERTIFICATE OF SERVICE

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

That on *(date)* June 30, 2020, service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

☐ Via 1<sup>st</sup> Class U.S. Mail, postage fully prepaid addressed as follows:

\_\_\_\_\_

☒ Via Electronic Service, in accordance with the Master Service List, pursuant to NEFCR 9, to:  
Alicia Exley, Esq.\_\_\_\_\_

☐ Via Facsimile and/or Email Pursuant to the Consent of Service by Electronic Means on file  
herein to: \_\_\_\_\_

Executed on the 30<sup>th</sup> day of June, 2020.

/s/ Chantel Wade  
Signature



**STATE OF NEVADA****PAYROLL INFORMATION****ADAM SOLINGER (70559)**

Agency:	██████████	Organization:	██████████
Pay Period:	CPP24		
Begin Date:	05/04/20	End Date:	05/17/20
Issue Date:	05/29/20	Check Number:	9181166
Deposit in the account of:	122400724-XXXXXXXXX9724	Net Pay:	\$2,925.42

**GROSS PAY**

<u>Pay Category</u>	<u>Hours</u>	<u>Amount</u>
PREG	80:00	\$3,272.00
Total Gross		\$3,272.00

**DEDUCTIONS**

<u>Deduction Category</u>	<u>Amount</u>
FIT	\$299.14
MEDEE	\$47.44
Total Deduction	\$346.58

**YEAR TO DATE AMOUNTS**

<u>Category</u>	<u>Amount</u>
GROSS	\$14,724.00
FIT	\$1,599.25
MEDICARE	\$211.09
PRETAX	\$165.94

**LEAVE ACCOUNTING THROUGH 05/17/20**

<u>Leave Category</u>	<u>Earned</u>	<u>Used</u>	<u>Balance</u>
ANNL	4.36	0.00	20.42
SICK	4.36	0.00	20.42

**HEALTH INSURANCE**

EMPL	HEALTH INS	C-HEALTH INS
DEP	HLTH DED PRE	C-HEALTH INS

**WITHHOLDING DATA**

WITHHOLDING STATUS	S
EXEMPTION	2
ADDED AMT	\$0.00

002452

**STATE OF NEVADA****PAYROLL INFORMATION****ADAM SOLINGER (70559)**

Agency:	██████████	Organization:	██████████
Pay Period:	CPP25		
Begin Date:	05/18/20	End Date:	05/31/20
Issue Date:	06/12/20	Check Number:	9199341
Deposit in the account of:	122400724-XXXXXXXXX9724	Net Pay:	\$2,861.90

**GROSS PAY**

<u>Pay Category</u>	<u>Hours</u>	<u>Amount</u>
PREG	80:00	\$3,272.00
Total Gross		\$3,272.00

**DEDUCTIONS**

<u>Deduction Category</u>	<u>Amount</u>
FIT	\$280.89
HTHDP	\$82.97
MEDEE	\$46.24
Total Deduction	\$410.10

**YEAR TO DATE AMOUNTS**

<u>Category</u>	<u>Amount</u>
GROSS	\$17,996.00
FIT	\$1,880.14
MEDICARE	\$257.33
PRETAX	\$248.91

**LEAVE ACCOUNTING THROUGH 05/31/20**

<u>Leave Category</u>	<u>Earned</u>	<u>Used</u>	<u>Balance</u>
ANNL	4.36	0.00	25.18
SICK	4.36	0.00	25.18

**HEALTH INSURANCE**

EMPL	HEALTH INS	C-HEALTH INS
DEP	HLTH DED PRE	C-HEALTH INS

**WITHHOLDING DATA**

WITHHOLDING STATUS	S
EXEMPTION	2
ADDED AMT	\$0.00

002453



STATE OF NEVADA

PAYROLL INFORMATION

ADAM SOLINGER (70559)

Agency:		Organization:	
Pay Period:	CPP26		
Begin Date:	06/01/20	End Date:	06/14/20
Issue Date:	06/26/20	Check Number:	9217567
Deposit in the account of:	122400724-XXXXXXXXX9724	Net Pay:	\$2,925.41

GROSS PAY

<u>Pay Category</u>	<u>Hours</u>	<u>Amount</u>
PREG	80:00	\$3,272.00
Total Gross		\$3,272.00

DEDUCTIONS

<u>Deduction Category</u>	<u>Amount</u>
FIT	\$299.14
MEDEE	\$47.45
Total Deduction	\$346.59

YEAR TO DATE AMOUNTS

<u>Category</u>	<u>Amount</u>
GROSS	\$21,268.00
FIT	\$2,179.28
MEDICARE	\$304.78
PRETAX	\$248.91

LEAVE ACCOUNTING THROUGH 06/14/20

<u>Leave Category</u>	<u>Earned</u>	<u>Used</u>	<u>Balance</u>
ANNL	4.36	0.00	29.54
SICK	4.36	0.00	29.54

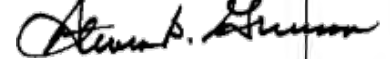
HEALTH INSURANCE

EMPL	HEALTH INS	C-HEALTH INS
DEP	HLTH DED PRE	C-HEALTH INS

WITHHOLDING DATA

WITHHOLDING STATUS	S
EXEMPTION	2
ADDED AMT	\$0.00

002454



1 **ORDR**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

4 **Alicia S. Exley, Esq.**

5 Nevada Bar No. 14192

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

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10 Fax: (702) 388-7406

11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

Date of Hearing: **June 1, 2020**

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

22 **ORDER FROM JUNE 1, 2020 HEARING**

23 THIS MATTER came on for hearing on the 1<sup>st</sup> day of June, 2020, before  
24 the Honorable Cheryl Moss, on for *Plaintiff's Motion for an Order to Permit*  
25 *Plaintiff to Retain the Sick Minor Children Pursuant to their Pediatrician's*  
26 *Directive, for Attorney's Fees and Costs and Related Relief; Defendant's*  
*opposition thereto and Countermotion for Make-Up Visitation Time; to Admonish*  
*Plaintiff to Abide by Joint Legal Custody Standards; for Attorney's Fees; and*

1 *Related Relief*; and Plaintiff's reply and opposition thereto; and Plaintiff, **Adam**  
2 **Michael Solinger** ("Adam") present and represented by and through his attorney,  
3 **Vincent Mayo, Esq.** of THE ABRAMS & MAYO LAW FIRM; and Defendant,  
4 **Chalese Marie Solinger** ("Chalese") present and represented by and through her  
5 attorney, **Alicia S. Exley, Esq.**, of PECOS LAW GROUP; and the Court being fully  
6 advised in the premises and good cause appearing, makes the following findings  
7 and orders:  
8

9 THE COURT NOTES that the court asked the parties and counsel if there  
10 was any reservation about appearing in person at trial and following the social  
11 distancing guidelines. Adam and his counsel noted that the only potential issue  
12 would be with Adam's father, who is a doctor. Chalese and her counsel noted no  
13 objections to going forward in person.<sup>1</sup>

14 THE COURT NOTES that if any exhibits are to be used for witnesses  
15 appearing via video, the share-screen function could be utilized, but counsel  
16 would need to waive objections to the court viewing exhibits before being  
17 admitted, as the court normally does not look at things unless they are actually  
18 admitted or stipulated to without objection. Even if the court sees the exhibit, but  
19 decides not to admit it under an objection, the offering party will not be able to  
20 rely on the exhibit for the findings made in the court's decision.<sup>2</sup>

21 THE COURT FURTHER NOTES that social distancing measures will need  
22 to be utilized during trial. If a party needs to speak with their counsel, they may  
23  
24

---

25 <sup>1</sup> See Video Transcript of June 1, 2020 hearing at Time Index ("TI") 9:31:58.

26 <sup>2</sup> See *Id.* at TI 9:34:02.

1 walk over to their counsel, with a mask on, to confer. Everyone who comes into  
2 the courtroom will need to make an affirmation that they do not have a fever or  
3 any COVID-19 symptoms. The parties and counsel will need to sit six feet apart  
4 and there cannot be more than ten people in the courtroom.<sup>3</sup>

5 THE COURT NOTES that in terms of joint calls to the doctor, this is a high  
6 conflict case. In the court's experience, parents not in high conflict could do a  
7 joint call, but the court does not know if it is feasible in this situation.<sup>4</sup>

8 THE COURT NOTES that it did review the two videos provided by  
9 Chalese. The court will not weigh in on them until trial.<sup>5</sup>

10 THE COURT HEREBY FINDS that, as to the issue of compensatory time  
11 in Chalese's countermotion, normally the court would take that up at trial, and it  
12 appears four days are on the table.<sup>6</sup>

13 THE COURT FURTHER FINDS that the court may make temporary orders  
14 regarding custody. Chalese missed four days and no one is disputing she got 24  
15 hours with the children the entire month of April. The court is not weighing in on  
16 that legal ruling today, but will afford Chalese additional time on a temporary  
17 basis.<sup>7</sup>

18 THE COURT FURTHER FINDS that unless Dr. Paglini's report is  
19 stipulated as a trial exhibit, Dr. Paglini will need to testify to verify and  
20

21  
22  
23 <sup>3</sup> See *Id.* at TI 9:35:40.

24 <sup>4</sup> See *Id.* at TI 9:50:57.

25 <sup>5</sup> See *Id.* at TI 9:56:02.

26 <sup>6</sup> See *Id.* at TI 9:49:10.

<sup>7</sup> See *Id.* at TI 9:50:12.

1 authenticate his report, otherwise it is hearsay unless he is there to be cross-  
2 examined about his report.<sup>8</sup>

3 NOW, THEREFORE, IT IS HEREBY ORDERED that no motion shall be  
4 necessary for Adam's father to appear as a witness at trial via Blue Jeans. Under  
5 the administrative orders, the Chief Judge has directed that Judges be  
6 accommodating and lenient with attorneys and witnesses in this regard. Adam's  
7 father may therefore appear as a witness at trial via Blue Jeans.<sup>9</sup>

9 IT IS FURTHER ORDERED that Chalese shall have two extra visitation  
10 days with the children, temporarily and without prejudice. She shall add one day  
11 to her next two visitation periods (i.e., Wednesday through Saturday and Friday to  
12 Monday). The additional outstanding requested compensatory visitation days are  
13 reserved for trial.<sup>10</sup>

14 IT IS FURTHER ORDERED that if the children are sick on an emergency  
15 basis, the parties are not required to do a joint call with the children's doctor. The  
16 custodial parent shall, in such situations, take the emergency measures and make  
17 an immediate call to the doctors, and then the other parent shall be notified  
18 immediately.<sup>11</sup>

20 IT IS FURTHER ORDERED that if the children are sick, the parents shall  
21 follow the doctor's orders.<sup>12</sup>

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23 <sup>8</sup> See *Id.* at TI 9:59:00.

24 <sup>9</sup> See *Id.* at TI 9:33:35.

25 <sup>10</sup> See *Id.* at TI 9:50:26.

26 <sup>11</sup> See *Id.* at TI 9:52:05.

<sup>12</sup> See *Id.* at TI 9:53:27.

1 IT IS FURTHER ORDERED that whether Chalese is currently following  
2 CDC guidelines will be a trial issue.<sup>13</sup>

3 IT IS FURTHER ORDERED that Adam may submit an ex parte application  
4 for an order to show cause regarding alleged violations of the “selfie rule.” If  
5 Adam submits the application and order to show cause prior to trial and the court  
6 finds it meets the requirements of *Awad* and it is specific enough, the court shall  
7 decide if it will grant the order to show cause, and Chalese may testify as to  
8 whether those allegations were intentional and deliberate misconduct or if there  
9 was a good reason.<sup>14</sup>

11 IT IS FURTHER ORDERED that the “selfie rule” is no longer in effect due  
12 to the Phase 2 re-opening.<sup>15</sup>

13 IT IS FURTHER ORDERED that the parties shall continue to follow the  
14 social distancing guidelines.<sup>16</sup>

15 IT IS FURTHER ORDERED that, as to the support issues, the court is not  
16 here today on financial issues. Adam is allowed to deduct one-half of the health  
17 insurance premium but no other unapproved deductions.<sup>17</sup>

19 IT IS FURTHER ORDERED that, per the stipulation of counsel, pre-trial  
20 memoranda shall be due one week after Dr. Paglini’s custody evaluation is  
21

22  
23 <sup>13</sup> See *Id.* at TI 9:54:09.

24 <sup>14</sup> See *Id.* at TI 9:54:43.

25 <sup>15</sup> See *Id.* at TI 9:55:16.

26 <sup>16</sup> See *Id.* at TI 9:55:41.

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



received by counsel.<sup>18</sup>

IT IS FURTHER ORDERED that either party may depose Dr. Paglini after his child custody evaluation is completed, and no 15-day notice of deposition shall be required.<sup>19</sup>

IT IS FURTHER ORDERED that either party may pre-pay Dr. Paglini to testify at trial without prejudice, subject to reimbursement or partial reimbursement at trial.<sup>20</sup>

IT IS FURTHER ORDERED that Ms. Exley shall prepare the order, with Mr. Mayo having seven days to review and approve as to form and content.<sup>21</sup>

IT IS FURTHER ORDERED that the hearing on Chalese's motion for order to show cause, currently scheduled for June 30, 2020 at 9:30 a.m. shall be vacated. Chalese shall submit an ex parte application for an order to show cause, the court shall review the same to ensure it complies with *Awad* and for specificity and detail, and if it is detailed enough, the court shall sign the order to show cause and set the matter for trial.<sup>22</sup>

IT IS FURTHER ORDERED that the June 30, 2020 trial day shall begin at 9:00 a.m. on June 30, 2020, as opposed to 1:30 p.m. Adam shall have all day on June 30, 2020 to present his case. Chalese shall have all afternoon on July 1, 2020 and all morning on July 2, 2020 to present her case. The afternoon of July 2, 2020

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<sup>18</sup> See *Id.* at TI 9:57:14.

<sup>19</sup> See *Id.* at TI 9:58:48.

<sup>20</sup> See *Id.* at TI 9:59:28.

<sup>21</sup> See *Id.* at TI 10:00:00.

<sup>22</sup> See *Id.* at TI 10:00:39.

1 shall be used for closing arguments. Each party shall therefore have a full day to  
2 present their cases. The JEA shall serve counsel with a new order setting  
3 evidentiary hearing.<sup>23</sup>

4 IT IS FURTHER ORDERED that counsel may set up and test videos in the  
5 courtroom at 8:30 a.m. on July 30, 2020, with trial to begin at 9:00 a.m.<sup>24</sup>

6 IT IS FURTHER ORDERED that the parties shall prepare five sets each of  
7 their trial exhibits. The parties and counsel may wear gloves, etc. if they are  
8 concerned about touching paper. Normally, exhibits are delivered three days prior  
9 to trial for marking of exhibits. The JEA shall contact counsel as to how the  
10 department shall be receiving exhibit notebooks and any physical evidence.<sup>25</sup>

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23 *See Id.* at TI 10:04:00.

24 *See Id.* at TI 10:05:25.

25 *See Id.* at TI 10:07:00.

1 IT IS FURTHER ORDERED that the parties are required to file updated  
2 Financial Disclosure Forms prior to trial if there are changes since the filing of the  
3 last Financial Disclosure Forms.<sup>26</sup>

4 DATED this 6 day of JULY, 2020.

5  
6   
7 DISTRICT COURT JUDGE -cf

8 Submitted by:  
9 PECOS LAW GROUP

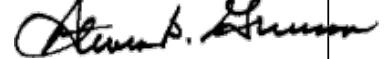
As to form and content:  
THE ABRAMS & MAYO LAW FIRM

10 /s/ Alicia S. Exley, Esq.

11 **Jack W. Fleeman, Esq.**  
12 Nevada Bar No. 010584  
13 **Alicia S. Exley, Esq.**  
14 Nevada Bar No. 014192  
15 8925 South Pecos Road, Suite 14A  
16 Henderson, Nevada 89074  
17 (702) 388-1851  
18 *Attorneys for Defendant*

19   
20 **Vincent Mayo, Esq.**  
21 Nevada Bar No. 008564  
22 6252 S. Rainbow Blvd., Suite 100  
23 Las Vegas, Nevada 89118  
24 (702) 222-4021  
25 *Attorney for Plaintiff*

26 <sup>26</sup> See Court Minutes from June 1, 2020 Hearing



1 **NEOJ**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

11 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

12 Attorneys for Defendant

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

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

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

Dept No. **I**

**NOTICE OF ENTRY OF ORDER**

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

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

20 **YOU WILL PLEASE TAKE NOTICE** that the “**Order from June 1,**  
21 **2020 Hearing**” was entered in the above-captioned case on the 6<sup>th</sup> day of **July,**  
22 **2020**, by filing with the clerk. A true and correct copy of said Order is attached  
23 hereto and made a part hereof.

24 **DATED** this 6<sup>th</sup> day of July, 2020.

25 /s/ Alicia S. Exley, Esq.

26 **Alicia S. Exley, Esq.**

Nevada Bar No. 14192

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

Attorney for Defendant

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**CERTIFICATE OF SERVICE**

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

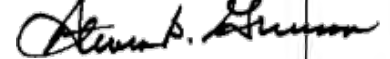
- ☒ pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system;
- ☐ by placing the same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☐ pursuant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

To individual(s) listed below at the address:

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

**DATED** this 6<sup>th</sup> day of July, 2020.

/s/ Alicia S. Exley, Esq.  
**Alicia S. Exley, Esq.**  
An employee of PECOS LAW GROUP



1 **ORDR**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

4 **Alicia S. Exley, Esq.**

5 Nevada Bar No. 14192

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

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9 Tel: (702) 388-1851

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11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

Date of Hearing: **June 1, 2020**

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

22 **ORDER FROM JUNE 1, 2020 HEARING**

23 THIS MATTER came on for hearing on the 1<sup>st</sup> day of June, 2020, before  
24 the Honorable Cheryl Moss, on for *Plaintiff's Motion for an Order to Permit*  
25 *Plaintiff to Retain the Sick Minor Children Pursuant to their Pediatrician's*  
26 *Directive, for Attorney's Fees and Costs and Related Relief; Defendant's*  
*opposition thereto and Countermotion for Make-Up Visitation Time; to Admonish*  
*Plaintiff to Abide by Joint Legal Custody Standards; for Attorney's Fees; and*

1 *Related Relief*; and Plaintiff's reply and opposition thereto; and Plaintiff, **Adam**  
2 **Michael Solinger** ("Adam") present and represented by and through his attorney,  
3 **Vincent Mayo, Esq.** of THE ABRAMS & MAYO LAW FIRM; and Defendant,  
4 **Chalese Marie Solinger** ("Chalese") present and represented by and through her  
5 attorney, **Alicia S. Exley, Esq.**, of PECOS LAW GROUP; and the Court being fully  
6 advised in the premises and good cause appearing, makes the following findings  
7 and orders:  
8

9 THE COURT NOTES that the court asked the parties and counsel if there  
10 was any reservation about appearing in person at trial and following the social  
11 distancing guidelines. Adam and his counsel noted that the only potential issue  
12 would be with Adam's father, who is a doctor. Chalese and her counsel noted no  
13 objections to going forward in person.<sup>1</sup>

14 THE COURT NOTES that if any exhibits are to be used for witnesses  
15 appearing via video, the share-screen function could be utilized, but counsel  
16 would need to waive objections to the court viewing exhibits before being  
17 admitted, as the court normally does not look at things unless they are actually  
18 admitted or stipulated to without objection. Even if the court sees the exhibit, but  
19 decides not to admit it under an objection, the offering party will not be able to  
20 rely on the exhibit for the findings made in the court's decision.<sup>2</sup>

21 THE COURT FURTHER NOTES that social distancing measures will need  
22 to be utilized during trial. If a party needs to speak with their counsel, they may  
23  
24

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25 <sup>1</sup> See Video Transcript of June 1, 2020 hearing at Time Index ("TI") 9:31:58.

26 <sup>2</sup> See *Id.* at TI 9:34:02.

1 walk over to their counsel, with a mask on, to confer. Everyone who comes into  
2 the courtroom will need to make an affirmation that they do not have a fever or  
3 any COVID-19 symptoms. The parties and counsel will need to sit six feet apart  
4 and there cannot be more than ten people in the courtroom.<sup>3</sup>

5 THE COURT NOTES that in terms of joint calls to the doctor, this is a high  
6 conflict case. In the court's experience, parents not in high conflict could do a  
7 joint call, but the court does not know if it is feasible in this situation.<sup>4</sup>

8 THE COURT NOTES that it did review the two videos provided by  
9 Chalese. The court will not weigh in on them until trial.<sup>5</sup>

10 THE COURT HEREBY FINDS that, as to the issue of compensatory time  
11 in Chalese's countermotion, normally the court would take that up at trial, and it  
12 appears four days are on the table.<sup>6</sup>

13 THE COURT FURTHER FINDS that the court may make temporary orders  
14 regarding custody. Chalese missed four days and no one is disputing she got 24  
15 hours with the children the entire month of April. The court is not weighing in on  
16 that legal ruling today, but will afford Chalese additional time on a temporary  
17 basis.<sup>7</sup>

18 THE COURT FURTHER FINDS that unless Dr. Paglini's report is  
19 stipulated as a trial exhibit, Dr. Paglini will need to testify to verify and  
20

21  
22  
23 <sup>3</sup> See *Id.* at TI 9:35:40.

24 <sup>4</sup> See *Id.* at TI 9:50:57.

25 <sup>5</sup> See *Id.* at TI 9:56:02.

26 <sup>6</sup> See *Id.* at TI 9:49:10.

<sup>7</sup> See *Id.* at TI 9:50:12.



1 authenticate his report, otherwise it is hearsay unless he is there to be cross-  
2 examined about his report.<sup>8</sup>

3 NOW, THEREFORE, IT IS HEREBY ORDERED that no motion shall be  
4 necessary for Adam's father to appear as a witness at trial via Blue Jeans. Under  
5 the administrative orders, the Chief Judge has directed that Judges be  
6 accommodating and lenient with attorneys and witnesses in this regard. Adam's  
7 father may therefore appear as a witness at trial via Blue Jeans.<sup>9</sup>

9 IT IS FURTHER ORDERED that Chalese shall have two extra visitation  
10 days with the children, temporarily and without prejudice. She shall add one day  
11 to her next two visitation periods (i.e., Wednesday through Saturday and Friday to  
12 Monday). The additional outstanding requested compensatory visitation days are  
13 reserved for trial.<sup>10</sup>

14 IT IS FURTHER ORDERED that if the children are sick on an emergency  
15 basis, the parties are not required to do a joint call with the children's doctor. The  
16 custodial parent shall, in such situations, take the emergency measures and make  
17 an immediate call to the doctors, and then the other parent shall be notified  
18 immediately.<sup>11</sup>

20 IT IS FURTHER ORDERED that if the children are sick, the parents shall  
21 follow the doctor's orders.<sup>12</sup>

---

23 <sup>8</sup> See *Id.* at TI 9:59:00.

24 <sup>9</sup> See *Id.* at TI 9:33:35.

25 <sup>10</sup> See *Id.* at TI 9:50:26.

26 <sup>11</sup> See *Id.* at TI 9:52:05.

<sup>12</sup> See *Id.* at TI 9:53:27.

1 IT IS FURTHER ORDERED that whether Chalese is currently following  
2 CDC guidelines will be a trial issue.<sup>13</sup>

3 IT IS FURTHER ORDERED that Adam may submit an ex parte application  
4 for an order to show cause regarding alleged violations of the “selfie rule.” If  
5 Adam submits the application and order to show cause prior to trial and the court  
6 finds it meets the requirements of *Awad* and it is specific enough, the court shall  
7 decide if it will grant the order to show cause, and Chalese may testify as to  
8 whether those allegations were intentional and deliberate misconduct or if there  
9 was a good reason.<sup>14</sup>

11 IT IS FURTHER ORDERED that the “selfie rule” is no longer in effect due  
12 to the Phase 2 re-opening.<sup>15</sup>

13 IT IS FURTHER ORDERED that the parties shall continue to follow the  
14 social distancing guidelines.<sup>16</sup>

15 IT IS FURTHER ORDERED that, as to the support issues, the court is not  
16 here today on financial issues. Adam is allowed to deduct one-half of the health  
17 insurance premium but no other unapproved deductions.<sup>17</sup>

19 IT IS FURTHER ORDERED that, per the stipulation of counsel, pre-trial  
20 memoranda shall be due one week after Dr. Paglini’s custody evaluation is  
21

22  
23 <sup>13</sup> See *Id.* at TI 9:54:09.

24 <sup>14</sup> See *Id.* at TI 9:54:43.

25 <sup>15</sup> See *Id.* at TI 9:55:16.

26 <sup>16</sup> See *Id.* at TI 9:55:41.

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

1 received by counsel.<sup>18</sup>

2 IT IS FURTHER ORDERED that either party may depose Dr. Paglini after  
3 his child custody evaluation is completed, and no 15-day notice of deposition shall  
4 be required.<sup>19</sup>

5 IT IS FURTHER ORDERED that either party may pre-pay Dr. Paglini to  
6 testify at trial without prejudice, subject to reimbursement or partial  
7 reimbursement at trial.<sup>20</sup>

8 IT IS FURTHER ORDERED that Ms. Exley shall prepare the order, with  
9 Mr. Mayo having seven days to review and approve as to form and content.<sup>21</sup>

10 IT IS FURTHER ORDERED that the hearing on Chalese's motion for order  
11 to show cause, currently scheduled for June 30, 2020 at 9:30 a.m. shall be vacated.  
12 Chalese shall submit an ex parte application for an order to show cause, the court  
13 shall review the same to ensure it complies with *Awad* and for specificity and  
14 detail, and if it is detailed enough, the court shall sign the order to show cause and  
15 set the matter for trial.<sup>22</sup>

16 IT IS FURTHER ORDERED that the June 30, 2020 trial day shall begin at  
17 9:00 a.m. on June 30, 2020, as opposed to 1:30 p.m. Adam shall have all day on  
18 June 30, 2020 to present his case. Chalese shall have all afternoon on July 1, 2020  
19 and all morning on July 2, 2020 to present her case. The afternoon of July 2, 2020

---

20 <sup>18</sup> See *Id.* at TI 9:57:14.

21 <sup>19</sup> See *Id.* at TI 9:58:48.

22 <sup>20</sup> See *Id.* at TI 9:59:28.

23 <sup>21</sup> See *Id.* at TI 10:00:00.

24 <sup>22</sup> See *Id.* at TI 10:00:39.

1 shall be used for closing arguments. Each party shall therefore have a full day to  
2 present their cases. The JEA shall serve counsel with a new order setting  
3 evidentiary hearing.<sup>23</sup>

4 IT IS FURTHER ORDERED that counsel may set up and test videos in the  
5 courtroom at 8:30 a.m. on July 30, 2020, with trial to begin at 9:00 a.m.<sup>24</sup>

6 IT IS FURTHER ORDERED that the parties shall prepare five sets each of  
7 their trial exhibits. The parties and counsel may wear gloves, etc. if they are  
8 concerned about touching paper. Normally, exhibits are delivered three days prior  
9 to trial for marking of exhibits. The JEA shall contact counsel as to how the  
10 department shall be receiving exhibit notebooks and any physical evidence.<sup>25</sup>

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22 <sup>23</sup> See *Id.* at TI 10:04:00.

23 <sup>24</sup> See *Id.* at TI 10:05:25.

24 <sup>25</sup> See *Id.* at TI 10:07:00.

1 IT IS FURTHER ORDERED that the parties are required to file updated  
2 Financial Disclosure Forms prior to trial if there are changes since the filing of the  
3 last Financial Disclosure Forms.<sup>26</sup>

4 DATED this 6 day of JULY, 2020.

6   
7 DISTRICT COURT JUDGE -cf

8 Submitted by:  
9 PECOS LAW GROUP

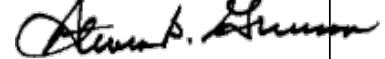
As to form and content:  
THE ABRAMS & MAYO LAW FIRM

10 /s/ Alicia S. Exley, Esq.

11 **Jack W. Fleeman, Esq.**  
12 Nevada Bar No. 010584  
13 **Alicia S. Exley, Esq.**  
14 Nevada Bar No. 014192  
15 8925 South Pecos Road, Suite 14A  
16 Henderson, Nevada 89074  
17 (702) 388-1851  
18 *Attorneys for Defendant*

19 **Vincent Mayo, Esq.**  
20 Nevada Bar No. 008564  
21 6252 S. Rainbow Blvd., Suite 100  
22 Las Vegas, Nevada 89118  
23 (702) 222-4021  
24 *Attorney for Plaintiff*

25  
26 <sup>26</sup> See Court Minutes from June 1, 2020 Hearing



1 **MOT**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

4 **Alicia S. Exley, Esq.**

5 Nevada Bar No. 14192

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12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

ORAL ARGUMENT **NOT**  
REQUESTED

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

27 **DEFENDANT'S MOTION TO EXTEND REBUTTAL EXPERT DEADLINE AND**  
28 **FOR ATTORNEY'S FEES**

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

1 PECOS LAW GROUP, and respectfully requests that this Court extend the deadline to  
2 retain and disclose a rebuttal expert, and for an award of fees.

3 This motion is made and based on all the papers and pleadings on file  
4 herein, the Points and Authorities submitted herewith, the affidavit attached  
5 hereto, and any further evidence and argument as may be adduced at the hearing  
6 of this matter.  
7

8 DATED this 20<sup>th</sup> day of July, 2020.

9  
10 PECOS LAW GROUP

11 /s/ Alicia S. Exley, Esq.

12 **Jack W. Fleeman, Esq.**

Nevada Bar No. 10584

13 **Alicia S. Exley, Esq.**

Nevada Bar No. 14192

14 8925 South Pecos Road, Suite 14A

15 Henderson, Nevada 89074

16 Attorneys for Defendant  
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1                                   **INITIAL STATEMENT OF ATTEMPTED RESOLUTION**

2           Pursuant to EDCR 5.501, a letter was sent to Plaintiff and his counsel  
3 requesting a stipulation to extend the rebuttal expert disclosure deadline. Plaintiff  
4 stated he would not stipulate to the same, and this motion follows.  
5

6                                   **POINTS AND AUTHORITIES**

7                                   **I. FACTS**

8                                   **A. BACKGROUND FACTS**

9           1.     Plaintiff **Adam Solinger** (“Adam”) and Defendant **Chalese Solinger**  
10 (“Chalese”) have been married since May 12, 2012 and have two children,  
11 **Michael Adam Solinger**, born June 16, 2015, and **Marie Leona Solinger**, born  
12 August 28, 2017.  
13

14           2.     Dr. Paglini is currently conducting a child custody evaluation for this  
15 matter.  
16

17           3.     On June 30, 2020, the Court ordered that rebuttal experts, if any,  
18 shall be retained and disclosed by July 20, 2020.<sup>1</sup>

19           4.     There is a six-day trial on calendar for this case in August 2020.

20           5.     Dr. Paglini’s report is currently due July 24, 2020.

21           6.     Counsel for Chalese has, so far, contacted eight potential rebuttal  
22 experts, but has been unable to retain a rebuttal expert to date.  
23  
24  
25

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26     <sup>1</sup>     While there is no clear, present indication that there will be concerns with Dr. Paglini’s  
ultimate report, Chalese simply wishes to preserve her right to retain a rebuttal expert should it  
ultimately be necessary.



1           7. Counsel has had issues with conflict (due to Adam working with  
2 experts in criminal cases), scheduling conflict, potential experts no longer being  
3 involved in custody litigation, and others simply declining. Defendant believed  
4 she had arranged for an expert at one point after counsel spoke with them, but that  
5 potential expert subsequently changed their mind and declined.  
6

7           8. On July 17, 2020, after the potential expert declined to be retained,  
8 Chalese's counsel reached out to Adam and his counsel<sup>2</sup> explaining the number of  
9 potential experts that were contacted and the issues faced, as outlined above, and  
10 requesting a stipulation that the rebuttal expert disclosure deadline be extended to  
11 July 20, 2020.  
12

13           9. On July 20, 2020, Adam responded that he would not stipulate to an  
14 extension of time to retain and disclose a rebuttal expert.  
15

16           10. Chalese therefore requests that the deadline to retain and disclose a  
17 rebuttal expert be extended by one week, to July 27, 2020.  
18

## 19                   **II. LEGAL ARGUMENT**

### 20                   **A. THE REBUTTAL EXPERT DISCLOSURE DEADLINE SHOULD 21                   BE EXTENDED.**

22           While this is a somewhat unique situation in that Dr. Paglini is preparing a  
23 child custody evaluation because the court ordered the evaluation, there is  
24 authority for the court to extend the rebuttal expert disclosure deadline. For  
25 example, NRCp 16.2(e)(3)(B) states that the court may extend the deadline to  
26

---

2           Mr. Mayo has represented he is currently in the process of withdrawing from this case,  
with Adam substituting himself in Proper Person, and gave permission to Chalese's counsel to  
communicate with Adam directly.

1 exchange expert reports “upon good cause shown.” Likewise, EDCR 2.35 allows  
2 for the extension of deadlines in civil cases pertaining to discovery.

3       There is good cause to extend the rebuttal expert disclosure deadline.  
4 Chalese’s counsel has contacted eight different psychologists. None of them have  
5 agreed to be retained to potentially provide a rebuttal expert report and/or  
6 testimony to Dr. Paglini’s child custody litigation. Counsel has found that many  
7 of these psychologists who used to do custody litigation work no longer do.  
8

9       Chalese may need to look outside of the Las Vegas area to retain a potential  
10 rebuttal expert, and will need additional time to do so. She therefore respectfully  
11 requests that the court extend the deadline by one week.  
12

13       Pursuant to NRCP 2.35, as for the discovery completed, most discovery has  
14 been completed in this case. The court is allowing for disclosures to be made until  
15 August 1, 2020. Both parties have been deposed, as well as some other witnesses.  
16 The outstanding discovery issue now is Dr. Paglini’s report and a potential  
17 rebuttal to that report, if needed, by either party.  
18

19       The rebuttal expert disclosure was not done by the deadline set by the court  
20 because Chalese’s counsel has been contacting potential experts all over town and  
21 has been unable to find one to retain and disclose as a potential rebuttal expert to  
22 Dr. Paglini’s custody evaluation. Chalese is requesting an additional week to find  
23 a rebuttal expert, and the current trial dates are August 20, 2020, August 21, 2020,  
24 August 24, 2020, August 25, 2020, August 27, 2020, and August 28, 2020.  
25

26 . . .

1       **B. DEFENDANT SHOULD BE AWARDED HER ATTORNEY’S FEES.**

2           Chalese attempted to resolve this issue without court intervention. She  
3 contends that extending the rebuttal expert disclosure date in this case will not  
4 prejudice either party, as Dr. Paglini’s report has not yet been sent to the court and  
5 trial is still a month away. Chalese should be awarded fees for having to bring this  
6 motion.  
7

8           Awards of attorney’s fees are within the sound discretion of the district  
9 court. *Fletcher v. Fletcher*, 89 Nev. 540, 516 P.2d 103 (1973); *Levy v. Levy*, 96  
10 Nev. 902, 620 P.2d 860 (1980); *Hybarger v. Hybarger*, 103 Nev. 255, 737 P.2d  
11 889 (1987).  
12

13          When an attorney in a family law case requests fees, the Court must  
14 consider several factors in determining the reasonable value of the services  
15 provided. *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31  
16 (1969). Those factors, referred to as the *Brunzell* factors, are: (1) *The Qualities of*  
17 *the Advocate*: to include ability, training, education, experience, professional  
18 standing and skill; (2) *The Character of the Work to Be Done*: to include the  
19 difficulty importance, time and skill required, the responsibility imposed and the  
20 prominence and character of the parties where they affect the importance of the  
21 litigation; (3) *The Work Actually Performed by the Lawyer*: to include the actual  
22 skill, time and attention given to the work; and (4) *The Result Obtained*: whether  
23 the attorney was successful and what benefits were derived. *Id.* The court should  
24 give equal weight to each of the *Brunzell* factors. *Miller v. Wilfong*, 121 Nev. 119  
25 (2005).  
26

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

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

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

15 b. **Alicia S. Exley, Esq.:** Ms. Exley is well-qualified and a member in  
16 good standing of the State Bar of Nevada. Ms. Exley worked for a family  
17 law attorney for four years prior to graduating from law school, passing the  
18 Bar Exam, and being admitted as a Nevada attorney. Ms. Exley has been  
19 practicing primarily in the field of family law for the last three years. She  
20 serves on the Community Service Committee of the Clark County Bar  
21 Association, earning her Committee Circle of Support Awards for 2018 and  
22 2019. She was also named a “Best Up & Coming Attorney” by Nevada  
23 Business Magazine in 2018. Ms. Exley has spoken about QDROs as part of  
24  
25  
26

1 the Downtown Cultural Series and had an article on economic abuse in  
2 divorce litigation published in the *Nevada Lawyer* in 2019.

3 c. **Angela Romero:** Ms. Romero has been working in the private sector  
4 as a family law paralegal since 2002, and currently holds a Bachelor of  
5 Science in Business Administration. Ms. Romero joined Pecos Law Group  
6 in 2017, and with more than 18 years of family law experience, she  
7 contributed knowledgeable and competent service on this case.  
8

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

11 3. With regard to the *Work Actually Performed by the Attorney*, Chalese's  
12 attorneys were well-prepared for the case. Through the course of this litigation,  
13 Counsel prepared procedurally proper pleadings and prepared for the hearing with  
14 skill, time, and attention.  
15

16 4. With regard to the *Results Obtained*, through application of law to the facts  
17 as set forth in her pleadings and will be introduced at the time of the hearing,  
18 Chalese believes she will prevail on all issues.  
19

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

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**III. CONCLUSION**

WHEREFORE, based upon the foregoing, Defendant **Chalese Marie Solinger** respectfully requests that this Court extend the deadline to retain and disclose a rebuttal expert, and for an award of fees.

DATED this 20<sup>th</sup> day of July, 2020.

PECOS LAW GROUP

/s/ Alicia S. Exley, Esq.

**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

1  
2  
3 **DECLARATION OF CHALESE SOLINGER**

4 CHALESE SOLINGER, under penalties of perjury, deposes and says:

5 1. I am the Defendant in the above-entitled action, am over the age of  
6 18, and am competent to testify to the matters contained herein.

7 2. I make this declaration in support of the foregoing DEFENDANT'S  
8 MOTION TO EXTEND REBUTTAL EXPERT DEADLINE AND FOR ATTORNEY'S FEES. I  
9 have read the foregoing Motion and hereby certify that the facts set forth in the  
10 Points and Authorities attached thereto are true of my own knowledge, except for  
11 those matters therein contained stated upon information and belief, and as to those  
12 matters, I believe them to be true.  
13

14 3. I declare under penalty of perjury that the foregoing is true and  
15 correct.  
16

17 EXECUTED on July 20, 2020

18  
19 

20 **Chalese Marie Solinger**  
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 20<sup>th</sup> day of July, 2020, I served a copy of “DEFENDANT’S MOTION TO EXTEND REBUTTAL EXPERT DEADLINE AND FOR ATTORNEY’S FEES” as follows:

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

To the individual(s) listed below:

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

/s/ Alicia S. Exley, Esq.

An employee of PECOS LAW GROUP



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.

<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.

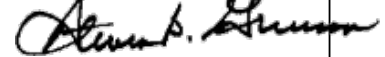
**Step 3.** Add the filing fees from Step 1 and Step 2.

The total filing fee for the motion/opposition I am filing with this form is:	
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Party filing Motion/Opposition: Defendant Date 7/20/2020

Signature of Party or Preparer /s/ Alicia S. Exley, Esq.

002484



1 **EPAP**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 Tel: (702) 388-1851

10 Fax: (702) 388-7406

11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

Date of Hearing: **August 26, 2020**

Time of Hearing: **No Appearance  
Required**

22 **EX PARTE APPLICATION FOR AN ORDER SHORTENING TIME ON**  
23 **DEFENDANT'S MOTION TO EXTEND REBUTTAL EXPERT DEADLINE AND**  
24 **FOR ATTORNEY'S FEES**

25 COMES NOW Defendant, **Chalese Marie Solinger** by and through her  
26 attorneys, **Jack W. Fleeman, Esq.** and **Alicia S. Exley, Esq.**, of the law firm  
PECOS LAW GROUP, and respectfully moves that, pursuant to EDCR 5.513, the

1 Court shorten time in which to hear DEFENDANT’S MOTION TO EXTEND REBUTTAL  
2 EXPERT DEADLINE AND FOR ATTORNEY’S FEES.

3 This application is made and based on all the papers and pleadings on file  
4 herein and the declaration of counsel attached hereto.

5 DATED this 21<sup>st</sup> day of July, 2020.

6 PECOS LAW GROUP

7  
8  
9 /s/ Alicia S. Exley, Esq.

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

Nevada Bar No. 10584

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

Nevada Bar No. 14192

12 8925 South Pecos Road, Suite 14A

13 Henderson, Nevada 89074

14 Attorneys for Defendant

15  
16 **DECLARATION OF COUNSEL**

17 ALICIA S. EXLEY, ESQ., being duly sworn, deposes and says:

18 1. I am an attorney of good standing duly licensed in Nevada. I am an  
19 attorney of record for Defendant.

20  
21 2. Plaintiff **Adam Michael Solinger** (“Adam”) and Defendant **Chalese**  
22 **Marie Solinger** (“Chalese”) are married and have two children: **Michael**  
23 **Solinger**, born June 16, 2015 and **Marie Solinger**, born August 28, 2017.

3. As described more fully in her motion, the Court set the deadline to retain and disclose a rebuttal expert witness for July 20, 2020. Chalese's counsel has contacted eight different psychologists so far to try to find a potential rebuttal expert and has been unable to obtain a potential rebuttal expert to disclose by the deadline.

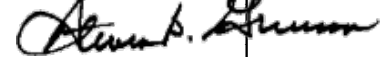
4. The hearing for this matter was set in chambers for August 26, 2020, which is after the start of trial.

5. As the deadline for this disclosure was July 20, 2020, and Chalese is requesting the deadline be extended to July 27, 2020, Chalese respectfully requests that the Court set this matter on its earliest judicial calendar.

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

DATED this 21<sup>st</sup> day of July, 2020

/s/ Alicia S. Exley, Esq.  
**Alicia S. Exley, Esq.**



**SAO**

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.	)	
	)	

**STIPULATION AND ORDER TO WITHDRAW**


**IT IS HEREBY STIPULATED AND AGREED** by ALICIA S. EXLEY, ESQ., attorney for Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as "Chalese"), and VINCENT MAYO, ESQ., attorney for Plaintiff, ADAM MICHAEL SOLINGER (hereinafter referred to as "Adam"), in the above-entitled matter, that Attorney Mayo shall be permitted with withdraw from the above referenced case. Adam will continue this case in proper person.


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Respectfully Submitted:  
THE ABRAMS & MAYO LAW  
FIRM

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

Approved as to form and content:  
PECOS LAW GROUP

  
Alicia S. Exley, Esq.  
Nevada State Bar Number: 14192  
8925 South Pecos Rd.,  
Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant

Approved as to Form and Content:  
  
Adam Michael Solinger  
Plaintiff, in proper person

3 **ORDER**

4 **THEREFORE**, based upon the stipulation of the parties and for  
5 good cause,

6 **IT IS HEREBY ORDERED SO ORDERED.**

7 Dated this 21 day of JULY, 2020.

8   
DISTRICT COURT JUDGE <sup>AF</sup>

9 Respectfully Submitted:

10 THE ABRAMS & MAYO LAW FIRM

11 /s/ Vincent Mayo, Esq.  
Vincent Mayo, Esq.  
12 Nevada State Bar Number: 8564  
6252 South Rainbow Blvd., Suite 100  
13 Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
14 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 THE STIPULATION AND ORDER TO**  
20 **WITHDRAW**

21 PLEASE TAKE NOTICE that the Stipulation and Order to Withdraw  
22 was duly entered in the above-referenced matter. A true and correct copy  
23 of said  
24

///

///

///



1 Stipulation and Order is attached hereto.

2 DATED Tuesday, July 21, 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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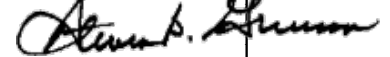
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Entry of Stipulation and Order to Withdraw* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Tuesday, July 21, 2020. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Alicia Exley, Esq.  
Attorney for Defendant

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



**SAO**

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.	)	
	)	

**STIPULATION AND ORDER TO WITHDRAW**


**IT IS HEREBY STIPULATED AND AGREED** by ALICIA S. EXLEY, ESQ., attorney for Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as "Chalese"), and VINCENT MAYO, ESQ., attorney for Plaintiff, ADAM MICHAEL SOLINGER (hereinafter referred to as "Adam"), in the above-entitled matter, that Attorney Mayo shall be permitted with withdraw from the above referenced case. Adam will continue this case in proper person.

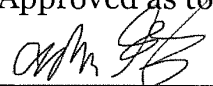
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Respectfully Submitted:  
THE ABRAMS & MAYO LAW  
FIRM

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

Approved as to form and content:  
PECOS LAW GROUP

  
Alicia S. Exley, Esq.  
Nevada State Bar Number: 14192  
8925 South Pecos Rd.,  
Suite 14A  
Henderson, Nevada 89074  
Tel: (702) 388-1851  
Fax: (702) 388-7406  
Attorney for Defendant

Approved as to Form and Content:  
  
Adam Michael Solinger  
Plaintiff, in proper person

3 **ORDER**

4 **THEREFORE**, based upon the stipulation of the parties and for  
5 good cause,

6 **IT IS HEREBY ORDERED SO ORDERED.**

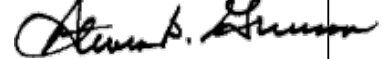
7 Dated this 21 day of JULY, 2020.

8   
DISTRICT COURT JUDGE <sup>AF</sup>

9 Respectfully Submitted:

10 THE ABRAMS & MAYO LAW FIRM

11 /s/ Vincent Mayo, Esq.  
Vincent Mayo, Esq.  
12 Nevada State Bar Number: 8564  
6252 South Rainbow Blvd., Suite 100  
13 Las Vegas, Nevada 89118  
Tel: (702) 222-4021  
14 Attorney for Plaintiff



1 **MOT**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 Tel: (702) 388-1851

10 Fax: (702) 388-7406

11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

**BEFORE THE DISCOVERY  
COMMISSIONER**

ORAL ARGUMENT **NOT**  
REQUESTED

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

27 **DEFENDANT'S MOTION TO EXTEND REBUTTAL EXPERT DEADLINE AND**  
28 **FOR ATTORNEY'S FEES**

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

1 PECOS LAW GROUP, and respectfully requests that this Court extend the deadline to  
2 retain and disclose a rebuttal expert, and for an award of fees.

3 This motion is made and based on all the papers and pleadings on file  
4 herein, the Points and Authorities submitted herewith, the affidavit attached  
5 hereto, and any further evidence and argument as may be adduced at the hearing  
6 of this matter.  
7

8 DATED this 24<sup>th</sup> day of July, 2020.

9 PECOS LAW GROUP

10  
11 /s/ Alicia S. Exley, Esq.

12 **Jack W. Fleeman, Esq.**

13 Nevada Bar No. 10584

14 **Alicia S. Exley, Esq.**

15 Nevada Bar No. 14192

16 8925 South Pecos Road, Suite 14A

17 Henderson, Nevada 89074

18 Attorneys for Defendant  
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1                                   **INITIAL STATEMENT OF ATTEMPTED RESOLUTION**

2           Pursuant to EDCR 5.501, a letter was sent to Plaintiff and his counsel  
3 requesting a stipulation to extend the rebuttal expert disclosure deadline. Plaintiff  
4 stated he would not stipulate to the same, and this motion follows.  
5

6                                   **POINTS AND AUTHORITIES**

7                                   **I. FACTS**

8                                   **A. BACKGROUND FACTS**

9           1.     Plaintiff **Adam Solinger** (“Adam”) and Defendant **Chalese Solinger**  
10 (“Chalese”) have been married since May 12, 2012 and have two children,  
11 **Michael Adam Solinger**, born June 16, 2015, and **Marie Leona Solinger**, born  
12 August 28, 2017.  
13

14           2.     Dr. Paglini is currently conducting a child custody evaluation for this  
15 matter.  
16

17           3.     On June 30, 2020, the Court ordered that rebuttal experts, if any,  
18 shall be retained and disclosed by July 20, 2020.<sup>1</sup>

19           4.     There is a six-day trial on calendar for this case in August 2020.

20           5.     Dr. Paglini’s report is currently due July 24, 2020.

21           6.     Counsel for Chalese has, so far, contacted eight potential rebuttal  
22 experts, but has been unable to retain a rebuttal expert to date.  
23  
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26     <sup>1</sup>     While there is no clear, present indication that there will be concerns with Dr. Paglini’s ultimate report, Chalese simply wishes to preserve her right to retain a rebuttal expert should it ultimately be necessary.



1           7. Counsel has had issues with conflict (due to Adam working with  
2 experts in criminal cases), scheduling conflict, potential experts no longer being  
3 involved in custody litigation, and others simply declining. Defendant believed  
4 she had arranged for an expert at one point after counsel spoke with them, but that  
5 potential expert subsequently changed their mind and declined.  
6

7           8. On July 17, 2020, after the potential expert declined to be retained,  
8 Chalese's counsel reached out to Adam and his counsel<sup>2</sup> explaining the number of  
9 potential experts that were contacted and the issues faced, as outlined above, and  
10 requesting a stipulation that the rebuttal expert disclosure deadline be extended to  
11 July 20, 2020.  
12

13           9. On July 20, 2020, Adam responded that he would not stipulate to an  
14 extension of time to retain and disclose a rebuttal expert.  
15

16           10. Chalese therefore requests that the deadline to retain and disclose a  
17 rebuttal expert be extended by one week, to July 27, 2020.  
18

## 19                           **II. LEGAL ARGUMENT**

### 20                   **A. THE REBUTTAL EXPERT DISCLOSURE DEADLINE SHOULD 21                   BE EXTENDED.**

22           While this is a somewhat unique situation in that Dr. Paglini is preparing a  
23 child custody evaluation because the court ordered the evaluation, there is  
24 authority for the court to extend the rebuttal expert disclosure deadline. For  
25 example, NRCP 16.2(e)(3)(B) states that the court may extend the deadline to  
26

---

<sup>2</sup> Mr. Mayo has represented he is currently in the process of withdrawing from this case, with Adam substituting himself in Proper Person, and gave permission to Chalese's counsel to communicate with Adam directly.

1 exchange expert reports “upon good cause shown.” Likewise, EDCR 2.35 allows  
2 for the extension of deadlines in civil cases pertaining to discovery.

3       There is good cause to extend the rebuttal expert disclosure deadline.  
4 Chalese’s counsel has contacted eight different psychologists. None of them have  
5 agreed to be retained to potentially provide a rebuttal expert report and/or  
6 testimony to Dr. Paglini’s child custody litigation. Counsel has found that many  
7 of these psychologists who used to do custody litigation work no longer do.  
8

9       Chalese may need to look outside of the Las Vegas area to retain a potential  
10 rebuttal expert, and will need additional time to do so. She therefore respectfully  
11 requests that the court extend the deadline by one week.  
12

13       Pursuant to NRCP 2.35, as for the discovery completed, most discovery has  
14 been completed in this case. The court is allowing for disclosures to be made until  
15 August 1, 2020. Both parties have been deposed, as well as some other witnesses.  
16 The outstanding discovery issue now is Dr. Paglini’s report and a potential  
17 rebuttal to that report, if needed, by either party.  
18

19       The rebuttal expert disclosure was not done by the deadline set by the court  
20 because Chalese’s counsel has been contacting potential experts all over town and  
21 has been unable to find one to retain and disclose as a potential rebuttal expert to  
22 Dr. Paglini’s custody evaluation. Chalese is requesting an additional week to find  
23 a rebuttal expert, and the current trial dates are August 20, 2020, August 21, 2020,  
24 August 24, 2020, August 25, 2020, August 27, 2020, and August 28, 2020.  
25

26 . . .

1       **B. DEFENDANT SHOULD BE AWARDED HER ATTORNEY’S FEES.**

2       Chalese attempted to resolve this issue without court intervention. She  
3       contends that extending the rebuttal expert disclosure date in this case will not  
4       prejudice either party, as Dr. Paglini’s report has not yet been sent to the court and  
5       trial is still a month away. Chalese should be awarded fees for having to bring this  
6       motion.  
7

8       Awards of attorney’s fees are within the sound discretion of the district  
9       court. *Fletcher v. Fletcher*, 89 Nev. 540, 516 P.2d 103 (1973); *Levy v. Levy*, 96  
10      Nev. 902, 620 P.2d 860 (1980); *Hybarger v. Hybarger*, 103 Nev. 255, 737 P.2d  
11      889 (1987).  
12

13      When an attorney in a family law case requests fees, the Court must  
14      consider several factors in determining the reasonable value of the services  
15      provided. *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31  
16      (1969). Those factors, referred to as the *Brunzell* factors, are: (1) *The Qualities of*  
17      *the Advocate*: to include ability, training, education, experience, professional  
18      standing and skill; (2) *The Character of the Work to Be Done*: to include the  
19      difficulty importance, time and skill required, the responsibility imposed and the  
20      prominence and character of the parties where they affect the importance of the  
21      litigation; (3) *The Work Actually Performed by the Lawyer*: to include the actual  
22      skill, time and attention given to the work; and (4) *The Result Obtained*: whether  
23      the attorney was successful and what benefits were derived. *Id.* The court should  
24      give equal weight to each of the *Brunzell* factors. *Miller v. Wilfong*, 121 Nev. 119  
25      (2005).  
26

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

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

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

15 b. **Alicia S. Exley, Esq.:** Ms. Exley is well-qualified and a member in  
16 good standing of the State Bar of Nevada. Ms. Exley worked for a family  
17 law attorney for four years prior to graduating from law school, passing the  
18 Bar Exam, and being admitted as a Nevada attorney. Ms. Exley has been  
19 practicing primarily in the field of family law for the last three years. She  
20 serves on the Community Service Committee of the Clark County Bar  
21 Association, earning her Committee Circle of Support Awards for 2018 and  
22 2019. She was also named a “Best Up & Coming Attorney” by Nevada  
23 Business Magazine in 2018. Ms. Exley has spoken about QDROs as part of  
24  
25  
26

1 the Downtown Cultural Series and had an article on economic abuse in  
2 divorce litigation published in the *Nevada Lawyer* in 2019.

3 c. **Angela Romero:** Ms. Romero has been working in the private sector  
4 as a family law paralegal since 2002, and currently holds a Bachelor of  
5 Science in Business Administration. Ms. Romero joined Pecos Law Group  
6 in 2017, and with more than 18 years of family law experience, she  
7 contributed knowledgeable and competent service on this case.  
8

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

11 3. With regard to the *Work Actually Performed by the Attorney*, Chalese's  
12 attorneys were well-prepared for the case. Through the course of this litigation,  
13 Counsel prepared procedurally proper pleadings and prepared for the hearing with  
14 skill, time, and attention.  
15

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

19 Counsel will submit applicable billings for the Court's assessment of its  
20 attorney's fees award as the Court directs.  
21

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**III. CONCLUSION**

WHEREFORE, based upon the foregoing, Defendant **Chalese Marie Solinger** respectfully requests that this Court extend the deadline to retain and disclose a rebuttal expert, and for an award of fees.

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

PECOS LAW GROUP

/s/ Alicia S. Exley, Esq.

**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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3 **CERTIFICATE OF SERVICE**

4 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW  
5 GROUP, and that on this 24<sup>th</sup> day of July, 2020, I served a copy of  
6 “DEFENDANT’S MOTION TO EXTEND REBUTTAL EXPERT DEADLINE AND FOR  
ATTORNEY’S FEES” as follows:

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

9 To the individual(s) listed below:

10 Adam M. Solinger	adam@702defense.com
11 admin email	email@pecoslawgroup.com
12 Alicia Exley	alicia@pecoslawgroup.com
13 Jack Fleeman	jack@pecoslawgroup.com
14 Angela Romero	angela@pecoslawgroup.com

15  
16  
17 /s/ Angela Romero  
18 An employee of PECOS LAW GROUP  
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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.

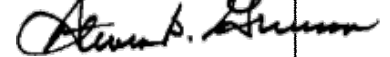
<input checked="" type="checkbox"/> <b>\$0</b>	The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>	The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>	The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

Party filing Motion/Opposition: Defendant Date 7/20/2020

Signature of Party or Preparer /s/ Alicia S. Exley, Esq.



1 **MOT**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 Tel: (702) 388-1851

10 Fax: (702) 388-7406

11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

**ORAL ARGUMENT REQUESTED**

22 **DEFENDANT'S MOTION TO CONTINUE TRIAL (SECOND REQUEST)**


23 **COMES NOW** Defendant **Chalese Marie Solinger** ("Chalese") by and  
24 through her attorneys, **Jack W. Fleeman, Esq.**, and **Alicia S. Exley, Esq.**, of  
25 **PECOS LAW GROUP** and moves this Court for the following orders:

- 26 1. An Order continuing the six-day trial set in August 2020; and
2. For other and further relief as the Court deems proper.

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

5 DATED this 29<sup>th</sup> day of July, 2020.

6 PECOS LAW GROUP

7 

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

3                    Pursuant to EDCR 5.501, futility and impracticability prevented an attempt  
4 at resolution in advance of filing this motion. Plaintiff is no longer represented by  
5 counsel and is appearing in this matter in proper person. Plaintiff has been  
6 unreasonable since his attorney withdrew, and due to the time limitations in play  
7 and the need to have this matter addressed as soon as possible, Defendant's  
8 counsel believed it futile and impracticable to attempt to get Plaintiff to agree to  
9 continue trial. Defendant's counsel will note that a stipulation to extend the  
10 rebuttal expert disclosure deadline by one week was previously requested of  
11 Plaintiff, and he refused; Defendant's counsel therefore did not believe Plaintiff  
12 would consider stipulating to the instant relief. Further, EDCR 7.30 states that trial  
13 settings may not be vacated by stipulation, but only by order of the court.  
14

15                                    **POINTS AND AUTHORITIES**

16                                    **I. FACTS**

17                    1.     Plaintiff **Adam Michael Solinger** ("Adam") and Defendant **Chalese**  
18 **Marie Solinger** ("Chalese") were married on May 12, 2012, in Las Vegas. There  
19 are two minor children of the marriage: Michael Solinger, born June 16, 2015 and  
20 Marie Solinger, born August 28, 2017.  
21

22                    2.     On December 9, 2019, this Court granted Chalese's motion for a  
23 child custody evaluation due to Adam's allegations about Chalese's mental health,  
24

1 as well as co-parenting issues. The Court ordered counsel to confer and stipulate  
2 to the custody evaluator.

3 3. Adam filed a motion for reconsideration after this hearing. His  
4 motion was not heard until February 26, 2020. At the February 26, 2020 hearing,  
5 the Court denied Adam's motion, in part, and ordered that the custody evaluation  
6 go forward. The Court set a deadline for Dr. Paglini's report for "mid-June" and  
7 set a trial to start June 30, 2020.

8  
9 4. On May 28, 2020, Chalese's counsel called Dr. Paglini's office to  
10 inquire as to when the report may be ready. Counsel left a message with Dr.  
11 Paglini's assistant but did not receive a call back.

12 5. On June 1, 2020, the Court held a hearing during which Adam  
13 represented he had spoken to Dr. Paglini a week prior and that Dr. Paglini was on  
14 track to complete his report on time, by mid-June 2020.

15 6. On June 15, 2020, Chalese's counsel called Dr. Paglini's office a  
16 second time to inquire as to the status of the report. Counsel left another message  
17 for Dr. Paglini but did not receive a call back that day.

18  
19 7. On June 16, 2020, Chalese's counsel called Dr. Paglini's office and  
20 was able to speak to his assistant. Dr. Paglini's assistant informed counsel that Dr.  
21 Paglini did not have an estimated time when the report would be done and that he  
22 was still working on it. Chalese's counsel subsequently relayed this information to  
23 Adam's counsel requesting a stipulation to continue trial because the report was  
24 not yet done.

1           8.     The same day, the Court's JEA informed counsel that the Judge had  
2 decided to continue the trial, which was going to commence June 30, 2020.

3           9.     On June 18, 2020, counsel was copied on a letter from Dr. Paglini  
4 alleging he had difficulties contacting Chalese and requesting an additional five  
5 weeks to complete his report.

6           10.    On June 19, 2020, Adam filed a motion accusing Chalese of being  
7 responsible for the Court continuing trial and being "purposefully dilatory" with  
8 respect to Dr. Paglini's evaluation.

9           11.    On June 30, 2020, Adam's motion was heard by the Court. Chalese  
10 and her counsel denied that Chalese was the cause of delay for Dr. Paglini's report  
11 and asserted that Chalese had been cooperative in the evaluation.

12           12.    At the June 30, 2020 hearing, the Court stated it would send  
13 correspondence to Dr. Paglini requesting clarification of his level and to state the  
14 level of cooperation from each party, as well as whether he considered any non-  
15 compliance to be intentional.

16           13.    The Court, at Adam's specific request, also ordered that any rebuttal  
17 expert witnesses would need to be retained and disclosed by July 20, 2020 and  
18 that Dr. Paglini's report would be due July 24, 2020.

19           14.    At the June 30, 2020 hearing, the Court set trial for this matter for  
20 August 20, August 21, August 24, August 25, August 27, and August 28, 2020.

1           15. The order from the June 30, 2020 hearing has not yet been entered,  
2 and thus it is unknown whether Dr. Paglini is even aware of the now passed July  
3 24, 2020 deadline for his report.

4           16. The entry of the order has been delayed because Adam's prior  
5 counsel did not sign-off on the proposed order. Then, when undersigned counsel  
6 submitted the proposed order to the court, Adam sent an inappropriate email to the  
7 court saying he objected to the contents of the order. Specifically, Adam wanted  
8 the order to state that Chalese was required to send a picture of the elderberry  
9 syrup (an issue he brought up without notice at the June 30, 2020 hearing)  
10 immediately after the hearing, rather than that same day.<sup>1</sup>

12           17. After the June 30, 2020 hearing, Chalese continued to work with Dr.  
13 Paglini. Sometime in early July 2020, Chalese was informed Dr. Paglini went on  
14 vacation but had called several of Chalese's collateral witnesses. She was told  
15 when Dr. Paglini returned, they would discuss a home visit.

---

17           <sup>1</sup> Adam's desire to have the order language reflect that Chalese was  
18 supposed to send a picture immediately after the hearing, instead of sometime  
19 later that day, is just another example of his unreasonable and money wasting  
20 behaviors in this case. First, Adam cannot provide any citation in the record where  
21 the court stated the picture had to be sent immediately after the hearing. Second,  
22 Adam is aware that Chalese had to log off of the video hearing early to go to a  
23 doctor's appointment. Third, Adam already knows that Chalese sent the picture  
24 later in the day after she was done with her doctor's appointment. So, what is the  
point of his requested change? To seek contempt on something that is irrelevant  
and petty? It is a waste of time, and it is again just Adam trying to harass Chalese  
at every turn.

1           18. In mid-July 2020, Dr. Paglini scheduled a home visit with Chalese for  
2 the weekend of July 31, 2020.

3           19. As of the date of the drafting of this motion, Dr. Paglini's custody  
4 evaluation is still not complete. Chalese had not been given a timeframe by Dr.  
5 Paglini as to when his report will be complete.

6           20. Chalese has filed a motion to extend the rebuttal expert deadline. As  
7 outlined in her motion, Chalese's counsel contacted eight potential rebuttal experts  
8 but has been unable to retain a rebuttal expert to date.

9           21. Chalese's counsel does not believe it will be possible to retain a  
10 rebuttal expert witness for a report to an evaluation that is still incomplete to be  
11 done prior to the start of trial on August 20, 2020.

12           a. Previous potential experts expressed concern about the short period in  
13 which to prepare a rebuttal report between July 24, 2020 and August  
14 20, 2020, and that period has since been even further reduced.

15           b. As of the date of the drafting of this motion, there will be only 23  
16 days until trial to get a rebuttal report prepared, and counsel still does  
17 not have a report.

18           22. Further, though Nevada had moved into Phase 2 reopening during the  
19 last couple of hearings in this case, cases of COVID-19 in Nevada continue to rise,  
20 increasing the risk of having in-person trials.

21           23. Finally, as the court is aware, Chalese is currently seven months  
22 pregnant and has been put on bedrest by her doctor. Though the Court indicated a



1 possibility of Chalese participating in trial via video, due to her current state of  
2 health it will be difficult, if not impossible, for counsel to prepare for trial with  
3 Chalese. Further, Chalese is already at risk for preterm labor and the trial date is  
4 close to her delivery date, especially given that Chalese has been having  
5 significant pre-term contractions. Chalese and counsel fear that the stress of a trial  
6 when Chalese is eight months pregnant will cause damage to Chalese's health and  
7 negatively impact her pregnancy.  
8

9 24. Chalese therefore respectfully requests that this court continue the  
10 trial set in this matter.

## 11 **II. LEGAL ARGUMENT**

### 12 **A. THE COURT SHOULD CONTINUE TRIAL.**

13 EDCR 7.30(a) states:

14 Any party may, for good cause, move the court for an order  
15 continuing the day set for trial of any cause. A motion for continuance  
16 of a trial must be supported by affidavit except where it appears to the  
17 court that the moving party did not have the time to prepare an  
18 affidavit, in which case counsel for the moving party need only be  
19 sworn and orally testify to the same factual matters as required for an  
20 affidavit. Counter-affidavits may be used in opposition to the motion.

21 Good cause exists to continue the trial in this matter, for several different  
22 reasons. First, as of the date of drafting of this motion, trial is approximately three  
23 weeks away, and counsel still does not have a child custody evaluation. Second, as  
24 discussed above, Chalese has been unable to retain a rebuttal expert by the  
25 deadline set by the Court.

1 At this point in time, Chalese believes that even if she were able to retain a  
2 rebuttal expert, they would not have enough time to prepare a rebuttal report in the  
3 three weeks prior to trial.

4  
5 Third, while it appeared the COVID-19 crisis may have turned a corner in  
6 June 2020, things have gotten worse since then. Cases are still going up, with  
7 more than 42,000 confirmed cases in Nevada. This is a significant increase from  
8 April, when the state was largely shut down. There are, therefore, major health  
9 risks associated with doing a six-day, in-person trial, and counsel does not  
10 anticipate that the number of COVID-19 cases will decrease dramatically in the  
11 coming weeks.

12  
13 Finally, Chalese is entering into her final trimester of pregnancy, on bedrest,  
14 and at risk for preterm labor. She needs to minimize her stress levels as much as  
15 possible, and it will be exceedingly difficult to try to prepare for trial with both  
16 Chalese's condition and the necessary precautions due to COVID-19. For those  
17 reasons, there is good cause to continue the trial in this matter, and Chalese  
18 respectfully requests that this Court do so.

19  
20 **III. CONCLUSION**

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

- 23 1. An Order continuing the six-day trial set in August 2020; and  
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2. For other and further relief as the Court deems proper.

DATED this 31<sup>st</sup> day of July, 2020.

PECOS LAW GROUP



---

**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

1       **DECLARATION OF ALICIA S. EXLEY, ESQ. PURSUANT TO EDCR 7.30(C)**

2           1.       I am an attorney for Defendant Chalese Solinger, along with Jack W.  
3 Fleeman, Esq. I am over the age of 18, and I am competent to testify to the matters  
4 contained herein.  
5

6           2.       Good cause exists to continue the trial in this matter:

7           a.       As of the date of drafting of this motion, trial is less than a month  
8 away, and counsel has not yet received the child custody evaluation from  
9 Dr. Paglini. It is unknown when the report is expected to be completed.

10          b.       Despite contacting several different psychological experts, we have  
11 been unable to retain a rebuttal expert by the deadline set by the Court,  
12 which is explained more fully in Chalese's motion to extend the expert  
13 rebuttal deadline.  
14

15          c.       Even if we were to retain a rebuttal expert, since the evaluation is not  
16 yet complete, we do not believe a rebuttal expert would have enough time  
17 to prepare a rebuttal report before trial.

18          d.       It appears that COVID-19 cases continue to rise in Nevada, and we  
19 believe there are major health risks associated with doing a six-day, in-  
20 person trial.  
21

22          e.       Chalese is entering into her final trimester of pregnancy, is on  
23 bedrest, and is at risk for preterm labor. We believe Chalese needs to  
24 minimize her stress levels as much as possible, and it will be exceedingly

1 difficult for us and Chalese to prepare for trial due to Chalese's condition  
2 and the necessary precautions due to COVID-19.

3 3. We have not attempted to obtain Adam's agreement to continue the  
4 trial, as explained above, due to our anticipated futility in doing so, as well as the  
5 time limitations involved.


6  
7 4. We are not requesting a continuance for any improper purpose.

8 5. We have discussed the request for a continuance with our client, and  
9 she is in agreement with the request for the continuance. We have provided  
10 Chalese with a copy of this motion and any supporting documents.

11 6. I have read the foregoing motion and the facts contained therein are  
12 true to the best of my knowledge, except for those stated upon information and  
13 belief, and as to those I believe them to be true.

14  
15 **I declare under penalty of perjury that the foregoing is true and**  
16 **correct.**

17 DATED this 29<sup>th</sup> day of July, 2020

18  
19   
20 \_\_\_\_\_  
21 **Alicia S. Exley, Esq.**

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1. I am the Defendant in the above-entitled action, am over the age of 18, and am competent to testify to the matters contained herein.

3. My motion for a child custody evaluation was granted on December 9, 2019. Adam filed a motion for reconsideration, which was heard on February 26, 2020. At that hearing, the Court ordered that the custody evaluation go forward. The Court set a deadline for Dr. Paglini's report for mid-June, and set a trial to start on June 30, 2020.

5. On June 30, 2020, the Court set a new deadline of July 24, 2020 for Dr. Paglini's evaluation and a deadline of July 20, 2020 for rebuttal experts to be

1 disclosed. The Court set the trial for August 20, August 21, August 24, August 25,  
2 August 27, and August 28, 2020.

3 6. Since the hearing, I have continued to work with Dr. Paglini. I was  
4 informed he was on vacation in early July 2020, but that he had called several of  
5 my collateral witnesses. I was also told that Dr. Paglini would conduct a home  
6 visit when he returned from his vacation.

7  
8 7. In mid-July 2020, Dr. Paglini scheduled a home visit with me for the  
9 weekend of July 31, 2020. I have not yet been given a timeframe by Dr. Paglini as  
10 to when he anticipates his report will be completed.

11  
12 8. I am informed by my counsel that we have been unable to retain a  
13 rebuttal expert so far, and there is a motion on calendar regarding that issue in  
14 front of the discovery commissioner.

15  
16 9. I am also aware that since the last hearing, COVID-19 cases in  
17 Nevada have been rising.

18 10. I am currently seven months pregnant, and I have been put on bedrest  
19 by my doctor. I am at risk for preterm labor, and I worry that the trial dates are  
20 close to my due date.

21  
22 11. I am concerned that the stress of a trial will cause damage to my  
23 health and negatively impact my pregnancy.

1           12. I am also concerned about the difficulty in preparing for trial with my  
2 attorneys due to my current condition as well as necessary precautions due to  
3 COVID-19.  
4

5           13. I have received a copy of this motion and any supporting  
6 documentation.  
7

8           14. I respectfully request that the Court continue the trial in this matter.  
9

10          15. I declare under penalty of perjury that the foregoing is true and  
11 correct.  
12

13           EXECUTED on July 29, 2020  
14

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**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 29<sup>th</sup> day of July, 2020, I served a copy of  
4 DEFENDANT'S MOTION TO CONTINUE TRIAL (SECOND REQUEST). as follows:

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

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

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

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

12 Adam M. Solinger	adam@702defense.com
13 admin email	email@pecoslawgroup.com
14 Alicia Exley	alicia@pecoslawgroup.com
15 Jack Fleeman	jack@pecoslawgroup.com
16 Angela Romero	angela@pecoslawgroup.com

17  
18 A courtesy copy has also been sent to: attorneyadamsolinger@gmail.com.

19  
20   
21 \_\_\_\_\_  
22 An employee of PECOS LAW GROUP  
23  
24

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam Solinger  
Plaintiff/Petitioner

v. Charles Solinger  
Defendant/Respondent

Case No. D-19-58245-D

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
- ☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
  - ☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
- ☐ **\$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.
- ☐ **\$57** The Motion/Opposition being filed 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.

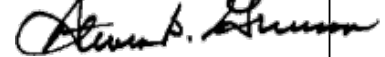
**Step 3.** Add the filing fees from Step 1 and Step 2.

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 7/29/20

Signature of Party or Preparer [Signature]



1 **EPAP**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

4 **Alicia S. Exley, Esq.**

5 Nevada Bar No. 14192

6 **PECOS LAW GROUP**

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12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

Date of Hearing: **September 8, 2020**

Time of Hearing: **10:00 a.m.**

22 **EX PARTE APPLICATION FOR AN ORDER SHORTENING TIME ON**  
23 **DEFENDANT'S MOTION TO CONTINUE TRIAL (SECOND REQUEST)**

24 COMES NOW Defendant, **Chalese Marie Solinger** by and through her  
25 attorneys, **Jack W. Fleeman, Esq.** and **Alicia S. Exley, Esq.**, of the law firm  
26 **PECOS LAW GROUP**, and respectfully moves that, pursuant to EDCR 5.513, the  
Court shorten time in which to hear **DEFENDANT'S MOTION TO CONTINUE TRIAL**  
(**SECOND REQUEST**).

1 This application is made and based on all the papers and pleadings on file  
2 herein and the declaration of counsel attached hereto.

3 DATED this 31<sup>st</sup> day of July, 2020.

4 PECOS LAW GROUP

5  
6 /s/ Alicia S. Exley, Esq.

7 **Jack W. Fleeman, Esq.**

8 Nevada Bar No. 10584

9 **Alicia S. Exley, Esq.**

10 Nevada Bar No. 14192

11 8925 South Pecos Road, Suite 14A

12 Henderson, Nevada 89074

13 Attorneys for Defendant

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**DECLARATION OF COUNSEL**

ALICIA S. EXLEY, ESQ., being duly sworn, deposes and says:

1. I am an attorney of good standing duly licensed in Nevada. I am an attorney of record for Defendant.

2. Plaintiff **Adam Michael Solinger** ("Adam") and Defendant **Chalese Marie Solinger** ("Chalese") are married and have two children: **Michael Solinger**, born June 16, 2015 and **Marie Solinger**, born August 28, 2017.

3. As described more fully in the motion, good cause exists to continue the trial date in this matter.

4. Trial is less than a month away, and Dr. Paglini has not yet completed his child custody evaluation.

1           5.     Chalese has been unable to retain a potential rebuttal expert witness  
2 by the deadline set by the court. Even if we were able to obtain a rebuttal expert,  
3 we do not believe an expert would have enough time to prepare a rebuttal report  
4 before trial at this point.

6           6.     It appears that COVID-19 cases continue to rise in Nevada, and we  
7 worry about potential health risks associated with a six-day-long in-person trial.

8           7.     Chalese is entering into her final trimester of pregnancy, is on  
9 bedrest, and is at risk for preterm labor. We believe it will be very difficult, with  
10 Chalese's condition and with COVID-19 precautions, to prepare for trial with  
11 Chalese.  
12

13          8.     This case is set for a six-day-long trial. Notwithstanding the fact that  
14 a trial in and of itself is stressful, we fear that the stress of six days of trial in her  
15 third trimester of pregnancy will have a detrimental effect on Chalese's health.

16          9.     Additionally, Mr. Fleeman just received a setting for an evidentiary  
17 hearing on August 21, 2020 in a protective order case where there are emergency  
18 issues that must be addressed quickly. I am also scheduled to be in trial with Mr.  
19 Shapiro on August 27, 2020 and August 28, 2020.  
20

21          10.    Trial is scheduled to begin on August 20, 2020. This matter is set to  
22 be heard on September 8, 2020 which is after trial is set to begin.  
23

24          11.    Pursuant to EDCR 7.30(f):  
25  
26

1 The party moving for the continuance of a trial may obtain an order  
2 shortening the time for the hearing of the motion for continuance.  
3 Except in an emergency, the party requesting a continuance shall give  
4 all opposing parties at least 3 days' notice of the time set for hearing  
the motion. The hearing of the motion shall be set not less than 1 day  
before the trial.

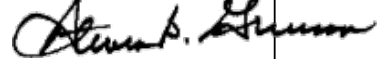
5 12. Plaintiff was served with the motion to continue trial on July 29, 2020  
6 and the notice of hearing on the motion to continue trial on July 31, 2020. Counsel  
7 will ensure he is served as soon as possible after receiving the order shortening  
8 time if the Court grants the same.  
9

10 13. Defendant therefore respectfully requests that the hearing on her  
11 motion to continue the trial be shortened and heard as soon as possible.

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

14  
15 DATED this 31<sup>st</sup> day of July, 2020  
16

17 /s/ Alicia S. Exley, Esq.  
18 **Alicia S. Exley, Esq.**  
19  
20  
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23  
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25  
26



1 **NONO**

Adam M. Solinger  
2 7290 Sea Anchor Ct  
Las Vegas, Nevada 89131  
3 Tel: (775) 720-9065  
Email: attorneyadamsolinger@gmail.com  
4 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:
CHALESE MARIE SOLINGER,	)	Time of Hearing:
	)	
Defendant.	)	

11 **NON-OPPOSITION TO DEFENDANT'S MOTION TO**  
12 **CONTINUE TRIAL AND COUNTERMOTION FOR SANCTIONS**

13 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL  
14 SOLINGER and hereby submits his *NON-OPPOSITION TO*  
15 *DEFENDANT'S MOTION TO CONTINUE TRIAL AND*  
16 *COUNTERMOTION FOR SANCTIONS.*

17 ///

18 ///

19 ///

20 ///

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1        This *Non-Opposition and Countermotion* are made and based  
2 upon the attached Points and Authorities, the Affidavit of Plaintiff  
3 attached hereto, the Appendix of Exhibits in support, all papers and  
4 pleadings on file herein, and any oral argument adduced at the hearing  
5 of this matter.

6        DATED Monday, August 03, 2020.

7                                Respectfully Submitted,

8                                /s/ Adam M. Solinger

9                                Adam M. Solinger  
10                                Plaintiff



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1 For the sake of clarifying the record, this is Defendant's fifth  
2 request to continue the trial. Defense Counsel knows this because their  
3 law firm has been counsel of record for all of these continuances. This  
4 trial was continued as follows:

- 5 1. October 2019 to December 2019.
- 6 2. December 2019 to January 2020.
- 7 3. January 2020 to June 2020
- 8 4. June 2020 to August 2020.
- 9 5. August 2020 to the new date set as a result of this motion  
10 (current request).

11 Pursuant to EDCR 5.514(a)(3), Defense Counsel is required to  
12 indicate how many times they have requested the matter be continued.  
13 As set forth in the caption, Defense Counsel states that this is  
14 "Defendant's Motion to Continue Trial (Second Request)." Pursuant to  
15 EDCR 7.6o(b)(4), Defense Counsel has, at a minimum, failed to comply  
16 with the rules by incorrectly listing the number of continuances that has  
17 been requested. This could also be construed as a deliberate attempt<sup>2</sup> to  
18 understate the number of continuances previously requested.

---

19 <sup>2</sup> Adam as an officer of the Court himself would very much like to give other attorneys the benefit of a  
20 doubt when it comes to issues of ethical impropriety. However, when defense counsel submits an  
21 incorrect order to the court, tries to distract from the issue through ad hominem, and then still does  
not correct their mistake, it's hard extend that benefit of a doubt.

1 **III. DEFENSE COUNSEL EXCUSES NOT CONSULTING**  
2 **WITH PLAINTIFF BY CLAIMING IT IS NOT NECESSARY**  
3 **UNDER THE RULES AND WOULD HAVE BEEN**  
4 **POINTLESS, BUT DEFENSE COUNSEL ASKED FOR**  
5 **ATTORNEY’S FEES WHEN THE SAME SITUATION WAS**  
6 **PRESENTED BY PLAINTIFF’S JUNE 30th MOTION TO**  
7 **ADDRESS THE TRIAL DATES.**

8 Defendant begins her motion by arguing that under the governing  
9 rules and statutes<sup>3</sup>, consultation with the Plaintiff is unnecessary when  
10 asking to continue trial and that it would have been futile to consult with  
11 the Plaintiff because of their belief that Plaintiff would have opposed the  
12 request. Obviously, it would not have been pointless because Plaintiff is  
13 not opposing the request.

14 However, Chalese and her Counsel asked that Adam be forced to  
15 pay attorney’s fees for asking to address the trial date in his motion that

---

16 <sup>3</sup> The Defense cites to EDCR 7.30 to argue that a trial can only be continued via motion. This is an  
17 incorrect reading of the rules. EDCR 7.30(f) only states that trial settings may not be vacated via  
18 stipulation. However, EDCR 7.30(h) states that “motions or stipulations to continue a civil trial that  
19 also seek extension of discovery dates must comply with Rule 2.35.” Thus, the rules contemplate a  
20 situation where the parties stipulate to continue trial. So, the correct statement of the rules are that  
21 the clerk cannot vacate a trial date just because the parties stipulate, but that the parties may  
stipulate and the dates be vacated as soon as the presiding judge orders the dates be vacated based  
upon the stipulation of the parties.

1 was heard on June 30th. These seemingly contradictory stances can only  
2 be explained by sheer incompetence or through being purposefully  
3 misleading.

4 The situations presented are nearly identical. However, when  
5 Adam was filing his motion to address the trial dates, the Defense  
6 actively stated that they would file a motion to continue the June 30,  
7 2020 trial setting if Adam did not agree to continue the case and thus  
8 consulting was pointless because the Defense was seeking the opposite  
9 relief from what Adam was seeking. As to the Defendant's current  
10 motion to continue trial, Adam refusing to agree to extend the time to  
11 notice a rebuttal expert is not the same as saying he wouldn't agree to  
12 continue trial when the facts<sup>4</sup> are materially different at the time the  
13 request to extend time to notice a rebuttal expert was made versus when  
14 a request to continue trial would have been made.

15 So, the Defendant and her Counsel cannot have it both ways.  
16 Either their request for attorney's fees for having to respond to Adam's  
17 motion was frivolous and thus warranting of attorney's fees for having to

---

18 <sup>4</sup> At the time Adam refused to stipulate to extend the time to notice a rebuttal expert, it was unknown  
19 to both parties that Dr. Paglini's evaluation would not be completed and that Chalese's pregnancy  
20 complications are such that her and her attorney are representing to the Court that trial would  
21 constitute a risk. This alleged risk is a departure from the stance previously espoused by the  
Defendant and is the subject of a different forth coming motion.

1 respond to that request, or they should have consulted with Adam on  
2 their request to continue trial and thus should be sanctioned for failing  
3 to do so, per their own previous argument.

4 **IV. DEFENSE COUNSEL’S ARGUMENT CONCERNING**  
5 **REASONABLENESS AND THE COURT’S JUNE 30,**  
6 **2020 ORDER WARRANTS SANCTIONS.**

7 As set forth above, the local rules allow for sanctions when an  
8 attorney makes presents to the court a motion which is obviously  
9 frivolous, unnecessary, or unwarranted. EDCR 7.60(b)(1).

10 Defense Counsel attempts to portray Adam’s actions of wanting the  
11 written order to accurately reflect the Court’s order from the hearing as  
12 inappropriate is ridiculous. Adam was unaware that his attorney  
13 abandoned him and did not pass along his objection to the timing  
14 language of when the elderberry syrup picture was to be sent. Thus,  
15 Adam emailed the JEA to let her know that there was an objection so  
16 that the Court did not think it was a defaulted order. Adam immediately  
17 drafted his own proposed order in compliance with the local rules for the  
18 Court’s consideration. If the situation ended there, it would be the end of  
19 this issue. Instead, Defense Counsel doubles down and tries to convince  
20 the Court that their submitted order accurately captured the Court’s

1 ruling that the picture was to be sent by the end of the day when that is  
2 not what the Court ordered.

3 To refresh the situation, Adam is and was concerned that Chalese was  
4 drugging the children and was lying about the medication being  
5 elderberry syrup. The Court agreed that it was potential gatekeeping and  
6 strongly admonished the Defendant and her Counsel that it was  
7 absolutely a co-parenting issue.

8 In an effort to demonize Adam, Defense counsel at length states the  
9 following:

10 Specifically, Adam wanted the order to state that  
11 Chalese was required to send a picture of the  
12 elderberry syrup (an issue he brought up without  
notice at the June 30, 2020 hearing)  
immediately after the hearing, rather than that  
same day.<sup>1</sup>

13 <sup>1</sup> Adam's desire to have the order language reflect  
14 that Chalese was supposed to send a picture  
immediately after the hearing, instead of  
15 sometime later that day, is just another example  
of his unreasonable and money wasting  
behaviors in this case. First, Adam cannot  
16 provide any citation in the record where the court  
stated the picture had to be sent immediately  
17 after the hearing. Second, Adam is aware that  
Chalese had to log off of the video hearing early  
18 to go to a doctor's appointment. Third, Adam  
already knows that Chalese sent the picture later  
19 in the day after she was done with her doctor's  
appointment. So, what is the point of his  
20 requested change? To seek contempt on  
something that is irrelevant and petty? It is a  
21

1 waste of time, and it is again just Adam trying to  
2 harass Chalese at every turn.

3 *Defendant's Motion to Continue Trial* at 4.

4 Defense Counsel makes several incorrect statements that can only  
5 be construed as purposeful. First, this is not a matter of contempt or  
6 being petty. Adam believes that Chalese is lying to this Court about what  
7 she is giving the children. The whole reason to order the picture be sent  
8 immediately is to show she actually had the elderberry syrup at her  
9 house and that she was giving it to the children. Otherwise, sending a  
10 picture whenever would give her ample time to go and purchase  
11 elderberry syrup, just like she did when she went to purchase a urine  
12 detox in response to Adam's September 2019 drug test request.

13 Second, this Court ordered that the picture be provided forthwith,  
14 immediately after the hearing. *See JAVS* from the June 30, 2020 hearing  
15 at 12:49 pm through 12:49:30 pm. This is the most troubling part of  
16 Defense Counsel's behavior. Defense Counsel knew what Adam's  
17 objection was to their proposed order. Rather than go back through the  
18 recording of the hearing, they instead try to convince this Court that  
19 Adam could not provide a citation. As they are well aware, Adam could  
20 not provide a citation because he was waiting on the JAVS file from the  
21 Court to come in the mail. Defense Counsel did not go back and review  
the hearing. Instead, their footnote and argument implies that Adam is

1 incorrect and that their proposed order, which excuses their client's non-  
2 compliance, is the correct order from the Court.

3       Additionally, Chalese having to leave the hearing early has no  
4 bearing on the resolution of this issue. She could have taken 30 seconds  
5 before she left to take and send the picture. Instead, she took and sent  
6 the picture at 6:00 pm. So, no, she did not do it when she was done with  
7 her doctor's appointment unless she is prepared to show that she did not  
8 leave her Doctor's office until that time.

9       A close examination of the picture she sent reveals several  
10 troubling things as well. The bottle she took a picture of is obviously  
11 brand new and the safety seal is still intact. That bottle has paper scrap  
12 from being in the box and has not been handled in anyway. It's an  
13 entirely full bottle with nothing missing and the dosing cup is completely  
14 clean. Finally, the reflection on the bottle reveals that Chalese is outside  
15 in her vehicle when she took the picture. Thus, the evidence strongly  
16 shows that, as Adam feared, Chalese went out and bought elderberry  
17 syrup and that is why she was delayed sending the picture.

18       Defense Counsel, like former defense counsel Schnieder, believes  
19 that this Court's orders are "hoops" to jump through. *See JAVS* from the  
20 June 30, 2020 hearing at 12:15 pm. As this Court told Mr. Schnieder, the  
21 Court's orders are orders and not hoops.



1 To the point at hand. Defense Counsel needs to realize their  
2 behavior is unacceptable. This issue is about the safety and welfare of the  
3 children and getting to the bottom of what is going on with the  
4 elderberry syrup claim by their client. This has nothing to do with being  
5 petty or harassing Chalese. This is about keeping children safe.

6 Had Defense Counsel not included their argument regarding the  
7 proposed order as part of this motion, there would be no argument  
8 regarding sanctions. However, Defense Counsel doubled down and as set  
9 forth above is now trying to litigate an incorrect position. The only  
10 defense would be that Defense Counsel did not order and/or watch the  
11 JAVS, despite being on notice of the issue, and instead is arguing from  
12 their recollection of the hearing. If Defense Counsel wants to admit to  
13 that level of incompetence, then so be it. Otherwise, the Court's order is  
14 clear as day at the timestamp set forth above and Defense Counsel's  
15 actions warrant sanctions to prevent this type of behavior in the future.

16 **V. THE ISSUE OF NOTICING A REBUTTAL EXPERT IS**

17 **MOOT BASED UPON TRIAL BEING CONTINUED.**

18 As mentioned, Adam did oppose extending the time to notice a  
19 rebuttal expert. This was the correct decision at the time because the  
20 Defendant made no mention of how long she had been looking for an  
21 expert. Instead, she relied on the fact that she had consulted with 8

1 experts and thought she had retained one who later declined to be an  
2 expert in the case. The Defendant asked for a one week extension and  
3 has yet to notice an expert making it appear that this request was  
4 pretextual and designed to generate good cause to continue the trial.  
5 This is further bolster by the fact that the motion to continue mentions  
6 nothing about additional steps taken to attempt to retain a rebuttal  
7 expert. Nonetheless, the motion is moot based upon trial being  
8 continued.

9 **VI. CONCLUSION**

10 Based on the foregoing, this Honorable Court should grant the  
11 request to continue trial to the earliest available setting next calendar  
12 year and should sanction Defense Counsel appropriately as set forth  
13 above.

14 DATED Monday, August 03, 2020.

15 Respectfully Submitted,

16  
17 /s/ Adam M. Solinger

18 Adam M. Solinger  
19 Plaintiff

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21 ///

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**DECLARATION OF ADAM MICHAEL SOLINGER**

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

1. I am the Plaintiff in the above-entitled action, and above the age of majority and am competent to testify to the facts contained in this affidavit, and make this sworn Declaration in support of the foregoing *Non-opposition to Defendant’s Motion to Continue Trial and Countermotion for Sanctions.*

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

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

DATED this 3<sup>rd</sup> day of August, 2020.

/s/ Adam M. Solinger  
Adam Michael Solinger

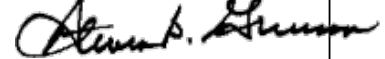
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Non-Opposition and Counter Motion* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Monday, August 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.  
Alicia Exley, Esq.  
Attorneys for Defendant

/s/ Adam M. Solinger  
Adam M. Solinger



1 **RPLY**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

4 **Alicia S. Exley, Esq.**

5 Nevada Bar No. 14192

6 **PECOS LAW GROUP**

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12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

Scheduled hearing date: **September 8,**  
**2020**

22 **REPLY TO PLAINTIFF'S NON-OPPOSITION TO DEFENDANT'S MOTION TO**  
23 **CONTINUE TRIAL**

24 **AND**

25 **OPPOSITION TO PLAINTIFF'S COUNTERMOTION FOR SANCTIONS**

26 COMES NOW Defendant, **Chalese Marie Solinger** by and through her  
attorneys, **Jack W. Fleeman, Esq.** and **Alicia S. Exley, Esq.**, of the law firm  
PECOS LAW GROUP, and respectfully submits her REPLY TO PLAINTIFF'S NON-  
OPPOSITION TO DEFENDANT'S MOTION TO CONTINUE TRIAL AND OPPOSITION TO

1 PLAINTIFF'S COUNTERMOTION FOR SANCTIONS and requests that this court enter  
2 orders granting her the relief requested in her motion and denying Plaintiff's  
3 countermotion.

4 This reply is made and based on all the papers and pleadings on file herein,  
5 the Points and Authorities submitted herewith, and the argument as may be  
6 adduced at the hearing of this matter.  
7

8 DATED this 5<sup>th</sup> day of August, 2020.

9 PECOS LAW GROUP  
10

11 /s/ Jack W. Fleeman, Esq.

12 **Jack W. Fleeman, Esq.**

13 Nevada Bar No. 10584

14 **Alicia S. Exley, Esq.**

15 Nevada Bar No. 14192

16 8925 South Pecos Road, Suite 14A

17 Henderson, Nevada 89074

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

2 **I. REPLY TO NON-OPPOSITION**

3  
4 Though Adam is not opposing Chalese's request to continue trial, he makes  
5 a number of representations to which Chalese and counsel would like to respond.  
6 First, Chalese has only filed one other motion to continue trial, on August 28,  
7 2019.

8  
9 At the time, trial was set to begin October 9, 2019.<sup>1</sup> This motion was based  
10 upon the fact that after Chalese hired Pecos Law Group ("PLG") in place of Mr.  
11 Schneider, it was discovered that Mr. Schneider had failed to make any  
12 preparations for trial in this case. By the time PLG entered the case, written  
13 discovery had not been done, no subpoenas had been served, and Adam had not  
14 even been deposed.

15  
16 At the September 6, 2019 hearing on Chalese's motion, the court did not  
17 continue the trial, only extended the discovery deadline.<sup>2</sup> Chalese's initial motion  
18 to continue was re-noticed in September 2019, and heard on October 3, 2019.  
19 After the hearing, the Court continued trial to January 2020.<sup>3</sup>

20  
21  
22  
23 <sup>1</sup> See Order after Hearing of June 17, 2019 at page 7, line 3-6.

24 <sup>2</sup> See Minutes from September 6, 2019 Hearing.

25 <sup>3</sup> See Minutes from October 3, 2019 Hearing.

1 After Adam's deposition, it became apparent that due to Adam's  
2 accusations of drug use/addiction, mental health issues, and general unfitness  
3 towards Chalese, that a child custody evaluation would be needed in this case.  
4

5 Chalese filed her motion for a custody evaluation in November 2019. At the  
6 hearing on that motion, on December 9, 2019, the Court agreed that a custody  
7 evaluation was warranted. In order to allow time to do the custody evaluation, the  
8 Court extended trial. The trial management order filed December 9, 2019 reflects  
9 that trial was set to begin June 30, 2020.<sup>4</sup>  
10

11 In mid-June 2020, the Court, of its own volition and with no input from  
12 Chalese or counsel, decided to continue trial again, to begin August 20, 2020.  
13 Chalese has, therefore, requested a trial continuance via a motion to continue  
14 twice in this case. The instant motion was her second motion to continue trial; it  
15 was therefore titled, "Motion to Continue Trial (Second Request)."  
16

17 As for Chalese's previous request for fees, this request was not predicated  
18 upon the fact that Adam was "asking to address the trial date," but because Adam  
19 implied in his motion that it was Chalese's "fault" that the Court decided to  
20 continue trial,<sup>5</sup> forcing Chalese to respond to his motion. Had Adam simply filed a  
21

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22 <sup>4</sup> See Order from December 9, 2019 Hearing at page 7, line 11-13 and Case and Non-Jury  
23 Trial Management Order filed December 9, 2019.

24 <sup>5</sup> This is shown in the very title of Adam's motion, which read, "*Motion to Address*  
25 *Upcoming Trial Date and Findings in Regard to Chalese's Refusal to Timely Facilitate the*  
*Completion of the Child Custody Evaluation.*"



1 motion to ask the Court for new trial dates and discovery deadlines without  
2 accusing Chalese of wrongdoing, she would not have had to incur fees opposing  
3 it.  
4

5 Chalese sent Adam's former counsel her doctor's note putting her on  
6 bedrest on July 10, 2020. She requested that Adam stipulate to extend the rebuttal  
7 expert deadline on July 17, 2020. While Chalese's condition was not as serious on  
8 July 10, 2020 as it is now, Adam was on notice that she was having complications  
9 before counsel requested he stipulate to extend the rebuttal expert report.  
10

11 As for Adam's argument regarding fees, Chalese filed her motion  
12 approximately three weeks before trial, and she filed it because the custody  
13 evaluation has not yet been completed and Chalese is having complications with  
14 her pregnancy. Asking Adam to stipulate to continue trial, waiting for his  
15 response, and then potentially arguing back and forth with him would have done  
16 nothing but waste valuable time, which is why counsel did not attempt to resolve  
17 it with him prior to filing the motion. If, however, Adam had corresponded with  
18 counsel before filing his motion, the allegations that Chalese was responsible for  
19 trial being continued could have at least been discussed and possibly resolved  
20 without court intervention.  
21  
22

23 In short, the difference is that Chalese is requesting a continuance of trial  
24 because Dr. Paglini is not finished with his report and due to the state of Chalese's  
25  
26

1 health. Adam filed his motion regarding the June 30, 2020 trial date to accuse  
2 Chalese of wrongdoing and request “findings” by the Court to that effect.

3  
4 **II. OPPOSITION TO COUNTERMOTION**

5 Adam is correct when he states EDCR 7.60(b)(1) allows for sanctions when  
6 a party files a motion or an opposition which is frivolous, unnecessary or  
7 unwarranted. Adam does not, however, explain how Chalese’s motion to continue  
8 trial is frivolous, unnecessary or unwarranted. Indeed, Adam is not opposing the  
9 motion. Instead, he is arguing that a footnote explaining that the order has not yet  
10 been entered from the last hearing, is frivolous.

12 Assuming for the sake of argument the footnote was frivolous, which  
13 counsel submits it was not, it was included for background information and has  
14 almost nothing to do with the substance of the motion to continue. Thus, it is  
15 impossible for the court to issue a finding that the motion frivolous.

17 In sum, Adam does not present a *prima facie* case for sanctions under  
18 EDCR 7.60(b)(1), as he claims. Adam does not even argue that the motion is  
19 frivolous – which ironically makes his countermotion for sanctions frivolous.  
20 Therefore, if anyone should be sanctioned, it should be Adam, not Chalese or her  
21 attorneys.

22  
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24 . . .

1 **I. CONCLUSION**

2 WHEREFORE, based on the foregoing, Defendant, **Chalese Marie**  
3 **Solinger**, respectfully requests that this court enter orders granting her the relief  
4 requested in her motion and denying Plaintiff's counter-motion.  
5

6 DATED this 5<sup>th</sup> day of August, 2020.

7 PECOS LAW GROUP

8  
9 /s/ Jack W. Fleeman, Esq.

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

11 Nevada Bar No. 10584

12 **Alicia S. Exley, Esq.**

13 Nevada Bar No. 14192

14 8925 South Pecos Road, Suite 14A

15 Henderson, Nevada 89074

16 Attorneys for Defendant  
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW  
3 GROUP, and that on this 5<sup>th</sup> day of August, 2020, I served a copy of REPLY TO  
4 PLAINTIFF'S NON-OPPOSITION TO DEFENDANT'S MOTION TO CONTINUE TRIAL AND  
5 OPPOSITION TO PLAINTIFF'S COUNTERMOTION FOR SANCTIONS as follows:

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

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

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

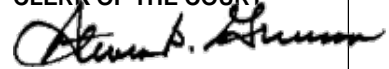
11 ☐ To be hand-delivered to the attorneys listed below at the address and/or  
12 facsimile number indicated below:

13 Adam M. Solinger	adam@702defense.com
14 admin email	email@pecoslawgroup.com
15 Alicia Exley	alicia@pecoslawgroup.com
16 Jack Fleeman	jack@pecoslawgroup.com
17 Angela Romero	angela@pecoslawgroup.com

18  
19 A courtesy copy has also been sent to: [attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com).  
20

21  
22 /s/ Alicia S. Exley, Esq.

23 An employee of PECOS LAW GROUP  
24  
25  
26



**ORDR**

**Jack W. Fleeman, Esq.**

Nevada Bar No. 10584

**Alicia S. Exley, Esq.**

Nevada Bar No. 14192

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[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**

Scheduled hearing date: **September 8, 2020**

**ORDER TO CONTINUE TRIAL**

This matter having been set for hearing on September 8, 2020, and pursuant to EDCR 5.502(d) and EDCR 5.504, this matter now comes before the Court for decision without a hearing. This Court has read and considered the current underlying pleadings in this matter, and therefore:

**THE COURT FINDS** that Defendant filed a Motion to Continue Trial on July 29, 2020. Plaintiff filed a Non-Opposition to Defendant's Motion to Continue Trial on August 3, 2020.

**THEREFORE:**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that pursuant to EDCR 7.30(a), Defendant's Motion to Continue Trial is GRANTED.

**IT IS FURTHER ORDERED** that the Evidentiary Hearing presently scheduled for August 20, 2020, August 21, 2020, ~~August 24, August 25, 2020,~~ August 27, 2020, and August 28 ~~at the hour of 8:30 a.m.~~ is hereby vacated and rescheduled to the following dates:

Day 1 - The 29 day of MARCH, 2021 at 9:00AM a.m./p.m.

Day 2 - The 30 day of MARCH, 2021, at 9:00AM a.m./p.m.

Day 3 - The 31 day of MARCH, 2021, at 9:00AM a.m./p.m.

Day 4 - The 1 day of APRIL, 2021 at 9:00AM a.m./p.m.

Day 5 - The 2 day of APRIL, 2021, at 9:00AM a.m./p.m.

~~Day 6 - The \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ a.m./p.m.~~

All hearings shall be heard in in Dept. I (courtroom 13) of the Family Court located at 601 N. Pecos Rd., Las Vegas, NV 89101.

**IT IS FURTHER ORDERED** that the closing arguments presently scheduled for September 1, 2020 at 1:30 p.m. is hereby vacated and reset to the 5 day of APRIL, 2021 at 1:30PM a.m./p.m. in Dept. I (courtroom 13) of the Family Court located at 601 N. Pecos Rd., Las Vegas, NV 89101.

...

...

1       **IT IS FURTHER ORDERED** that the new discovery deadlines shall be as  
2 follows:

3       Discovery Cut-Off	<u>02/26/2021</u>
4	
5       Expert Witness Disclosure Due:	<u>02/26/2021</u>
6       Expert Witness Reports Due:	<u>02/26/2021</u>
7       Rebuttal Expert Witness Due:	<u>02/26/2021</u>
8       Rebuttal Expert Reports Due:	<u>02/26/2021</u>
9       Pre-Trial Memorandum Due:	<u>02/26/2021</u>
10       List of Witnesses Due:	<u>02/26/2021</u>
11	
12	

13       **IT IS FURTHER ORDERED** that any and all Exhibits and Witness List (a  
14 set of original exhibits ready for marking by the Clerk with a courtesy copy for the  
15 Court), must be delivered to chambers at least 5 days prior to trial for marking.  
16

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1           **IT IS FURTHER ORDERED** that the hearing scheduled for September 8,  
2 2020 at 10:00 a.m. for Defendant's Motion to Continue Trial is hereby VACATED.

3           DATED AUGUST 10, 2020 .

4   
5 **DISTRICT COURT JUDGE<sup>AF</sup>**

6 Respectfully submitted by:  
7 PECOS LAW GROUP

8 /s/ Alicia S. Exley

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

10 Nevada Bar No. 10584

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

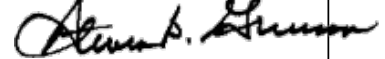
12 Nevada Bar No. 14192

13 8925 South Pecos Road, Suite 14A

14 Henderson, Nevada 89074

(702) 388-1851

*Attorneys for Defendant*



1 **NEOJ**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

11 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

12 Attorneys for Defendant

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

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

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

Dept No. **I**

**NOTICE OF ENTRY OF ORDER TO CONTINUE TRIAL**

18 TO: **Adam Michael Solinger**, Plaintiff in Proper Person:

19 **YOU WILL PLEASE TAKE NOTICE** that the “**Order to Continue**  
20 **Trial**” was entered in the above-captioned case on the **10<sup>th</sup>** day of **August, 2020**,  
21 by filing with the clerk. A true and correct copy of said Order is attached hereto  
22 and made a part hereof.

23 **DATED** this 10<sup>th</sup> day of August, 2020.

24 /s/ Alicia S. Exley, Esq.

25 **Alicia S. Exley, Esq.**

26 Nevada Bar No. 14192

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

Attorney for Defendant

1  
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I hereby certify that the “**Notice of Entry of Order to Continue Trial**” in the above-captioned case was served this date as follows:

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

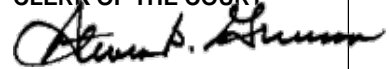
To individual(s) listed below at the address:

Adam M. Solinger	adam@702defense.com
admin email	email@pecoslawgroup.com
Alicia Exley	alicia@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com

A courtesy copy has also been sent to: [attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com).

**DATED** this 10<sup>th</sup> day of August, 2020.

/s/ Alicia S. Exley, Esq.  
**Alicia S. Exley, Esq.**  
An employee of PECOS LAW GROUP



**ORDR**

**Jack W. Fleeman, Esq.**

Nevada Bar No. 10584

**Alicia S. Exley, Esq.**

Nevada Bar No. 14192

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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**

Scheduled hearing date: **September 8, 2020**

**ORDER TO CONTINUE TRIAL**

This matter having been set for hearing on September 8, 2020, and pursuant to EDCR 5.502(d) and EDCR 5.504, this matter now comes before the Court for decision without a hearing. This Court has read and considered the current underlying pleadings in this matter, and therefore:

**THE COURT FINDS** that Defendant filed a Motion to Continue Trial on July 29, 2020. Plaintiff filed a Non-Opposition to Defendant's Motion to Continue Trial on August 3, 2020.

1 **THEREFORE:**

2 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that pursuant  
3 to EDCR 7.30(a), Defendant's Motion to Continue Trial is GRANTED.  
4

5 **IT IS FURTHER ORDERED** that the Evidentiary Hearing presently  
6 scheduled for August 20, 2020, August 21, 2020, ~~August 24, August 25, 2020,~~  
7 August 27, 2020, and August 28 ~~at the hour of 8:30 a.m.~~ is hereby vacated and  
8 rescheduled to the following dates:  
9

10 Day 1 - The 29 day of MARCH, 2021 at 9:00AM a.m./p.m.

11 Day 2 - The 30 day of MARCH, 2021, at 9:00AM a.m./p.m.

12 Day 3 - The 31 day of MARCH, 2021, at 9:00AM a.m./p.m.

13 Day 4 - The 1 day of APRIL, 2021 at 9:00AM a.m./p.m.

14 Day 5 - The 2 day of APRIL, 2021, at 9:00AM a.m./p.m.

15 ~~Day 6 - The \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ a.m./p.m.~~

16 All hearings shall be heard in in Dept. I (courtroom 13) of the Family Court  
17 located at 601 N. Pecos Rd., Las Vegas, NV 89101.  
18  
19

20 **IT IS FURTHER ORDERED** that the closing arguments presently scheduled  
21 for September 1, 2020 at 1:30 p.m. is hereby vacated and reset to the 5 day of  
22 APRIL, 2021 at 1:30PM a.m./p.m. in Dept. I (courtroom 13) of the  
23 Family Court located at 601 N. Pecos Rd., Las Vegas, NV 89101.  
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1       **IT IS FURTHER ORDERED** that the new discovery deadlines shall be as  
2 follows:

3       Discovery Cut-Off	<u>02/26/2021</u>
4	
5       Expert Witness Disclosure Due:	<u>02/26/2021</u>
6       Expert Witness Reports Due:	<u>02/26/2021</u>
7       Rebuttal Expert Witness Due:	<u>02/26/2021</u>
8       Rebuttal Expert Reports Due:	<u>02/26/2021</u>
9       Pre-Trial Memorandum Due:	<u>02/26/2021</u>
10       List of Witnesses Due:	<u>02/26/2021</u>
11	
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13       **IT IS FURTHER ORDERED** that any and all Exhibits and Witness List (a  
14 set of original exhibits ready for marking by the Clerk with a courtesy copy for the  
15 Court), must be delivered to chambers at least 5 days prior to trial for marking.  
16

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1           **IT IS FURTHER ORDERED** that the hearing scheduled for September 8,  
2 2020 at 10:00 a.m. for Defendant's Motion to Continue Trial is hereby VACATED.

3           DATED AUGUST 10, 2020 .

4   
5 **DISTRICT COURT JUDGE<sup>AF</sup>**

6 Respectfully submitted by:  
7 PECOS LAW GROUP

8 /s/ Alicia S. Exley

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

10 Nevada Bar No. 10584

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

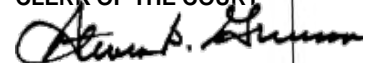
12 Nevada Bar No. 14192

13 8925 South Pecos Road, Suite 14A

14 Henderson, Nevada 89074

(702) 388-1851

*Attorneys for Defendant*



1 LOUIS C. SCHNEIDER, ESQ.  
2 Nevada Bar Number 9683  
3 430 South 7<sup>th</sup> Street  
4 Las Vegas, Nevada 89101  
5 T: (702) 435-2121  
6 F: (702) 431-3807  
7 Attorney for Defendant  
8 lcsllawllc@yahoo.com

9  
10 **DISTRICT COURT,**  
11 **FAMILY DIVISION**  
12 **CLARK COUNTY, NEVADA**

13 ADAM M. SOLINGER,  
14 Plaintiff,

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

15 vs.

16 CHALISE M. SOLINGER,  
17 Defendant.

18 **ORDER FROM THE HEARING HELD OCTOBER 9, 2019**

19  
20 COMES NOW, LOUIS SCHNEIDER, ESQ. of the LAW OFFICES OF LOUIS C.  
21 SCHNEIDER, LLC, appearing on behalf of the LAW OFFICES OF LOUIS C.  
22 SCHNEIDER, LLC, JACK W. FLEEMAN, ESQ., present for BRUCE I SHAPIRO,  
23 ESQ., on behalf of the Defendant, who was not present, and VINCENT MAYO, ESQ.  
24 appearing on behalf of the Plaintiff, who was present with his counsel, the parties having  
25 come before this Court on October 9, 2019, and respectfully submits this Order.  
26  
27  
28



1 After a review of the pleadings and papers on file herein, the Points and Authorities  
2 submitted herewith, and any oral argument or testimony adduced at the hearing of this  
3 motion herein, this Court orders as follows:  
4

5 **FINDINGS**

6 **THE COURT FINDS** that *Fredianelli v. Fine Carman Price*, 133 Nev. 586, 402  
7 P.3d 1254 (2017) is the controlling law in this case.  
8

9 **THE COURT FURTHER FINDS** that Mr. Schneider's motion to withdraw and  
10 adjudicate attorney's lien, made pursuant to NRS 18.015, was timely filed and properly  
11 served. *Video citation from hearing held October 9, 2019, starting at 9:16:54.*  
12

13 **THE COURT FURTHER FINDS** that the billing statement Mr. Schneider  
14 provided is sufficiently detailed, and is satisfactory to the Court, as a basis upon which to  
15 award attorney's fees. *Video citation 9:17:48.*  
16

17 **THE COURT FURTHER FINDS** that an award of attorney's fees to Mr.  
18 Schneider in the amount of \$10,875 is reasonable. *Video citation 9:22:04, and 9:22:24.*  
19

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**ORDER**

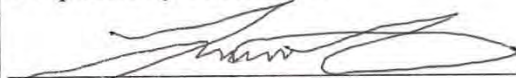
**IT IS HEREBY ORDERED** that Mr. Schneider is awarded attorney's fees in the amount of \$10,875. Such award is reduced to judgment, enforceable by any legal means.

**IT IS FURTHER ORDERED** that the execution of this judgment is stayed pending resolution at trial.

Dated this 19 day of AUGUST, 2020.

  
DISTRICT COURT JUDGE *MC*

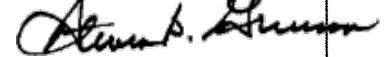
Respectfully submitted:

  
LOUIS C. SCHNEIDER, ESQ.  
Nevada Bar Number 9683  
430 S. 7<sup>th</sup> St.  
Las Vegas, NV 89101  
(702) 435-2121  
lcslawllc@yahoo.com

Approved as to form and content:

\_\_\_\_\_  
Jack W. Fleeman, Esq.  
Nevada Bar Number 10584  
PECOS LAW GROUP  
8925 South Pecos Road Suite 14A  
Henderson, Nevada 89074  
Ph: 702.388.1851  
Email: Bruce@pecoslawgroup.com  
Attorney for Defendant

\_\_\_\_\_  
Vincent Mayo, Esq.  
Nevada Bar Number 8564  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Ph: 702. 222-4021  
Email: VMGroup@theabramslawfirm.com  
Attorney for Plaintiff



1 **NOAS**  
2 **Jack W. Fleeman, Esq.**  
3 Nevada Bar No. 10584  
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 Tel: (702) 388-1851  
10 Fax: (702) 388-7406  
11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)  
12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)  
13 Attorneys for Defendant

9 **DISTRICT COURT**  
10 **FAMILY DIVISION**  
11 **CLARK COUNTY, NEVADA**

12 **Adam Michael Solinger,**

13 Plaintiff,

14 vs.

15 **Chalese Marie Solinger,**

16 Defendant.  
17

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

Dept No. **I**

18 **NOTICE OF APPEAL**

19  
20 Notice is hereby given that **Chalese Marie Solinger**, Defendant above  
21 named, hereby appeals to the Supreme Court of the State of Nevada from the

22 . . .

23 . . .

24 . . .

25 . . .  
26 . . .

1 "Order from the Hearing Held October 9, 2019" entered in this action on the 19<sup>th</sup>  
2 day of August, 2020.

3 DATED this 2<sup>nd</sup> day of September, 2020

4  
5 PECOS LAW GROUP

6  
7 

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

9 Nevada Bar No. 10584

**Alicia S. Exley, Esq.**

10 Nevada Bar No. 14192

11 8925 South Pecos Road, Suite 14A

12 Henderson, Nevada 89074

13 Attorneys for Defendant

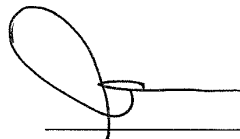
1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that the foregoing "*Notice of Appeal*" in the above-  
3 captioned case was served this date by and through Wiz-Net Electronic Service,  
4 pursuant to Clark County District Court Administrative Order 14-2 for service of  
5 documents identified in Rule 9 of the N.E.F.C.R.  
6

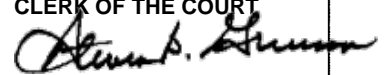
7 Adam M. Solinger	adam@702defense.com
8 admin email	email@pecoslawgroup.com
9 Alicia Exley	alicia@pecoslawgroup.com
10 Jack Fleeman	jack@pecoslawgroup.com
11 Angela Romero	angela@pecoslawgroup.com
12 Louis Schneider	lcsllawllc@gmail.com

13  
14 A courtesy copy will also be emailed to attorneyadamsolinger@gmail.com.

15 DATED this 2nd day of September, 2020.

16  
17 

18 Janine Shapiro,  
19 an employee of PECOS LAW GROUP  
20  
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1 **ASTA**  
2 **Jack W. Fleeman, Esq.**  
Nevada Bar No. 10584  
3 **Alicia S. Exley, Esq.**  
Nevada Bar No. 14192  
4 PECOS LAW GROUP  
8925 South Pecos Road, Suite 14A  
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Fax: (702) 388-7406  
7 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)  
8 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)  
Attorneys for Defendant

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

11  
12 **Adam Michael Solinger,**

13 Plaintiff,

14 vs.

15 **Chalese Marie Solinger,**

16 Defendant.  
17

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

Dept No. **I**

18  
19 **CASE APPEAL STATEMENT**

20 COMES NOW Defendant **Chalese Marie Solinger**, by and through her  
21 attorneys, **Jack W. Fleeman, Esq.** and **Alicia S. Exley, Esq.**, of the law firm of  
22 PECOS LAW GROUP, and pursuant to NRAP 3(a)(1), respectfully presents her Case  
23 Appeal Statement.

24 1. **Chalese Marie Solinger**, Defendant above-named, is the Appellant  
25 filing this case appeal statement.  
26

1       2.     The Honorable **Cheryl B. Moss**, Eighth Judicial District Court, Family  
2 Division, is the district court judge who issued the decision wherefrom this appeal  
3 arises.

4       3.     The parties who were involved in the district court proceedings  
5 wherefrom this appeal arises are as follows:

- 6           a) **Adam Michael Solinger** (“Adam”), Plaintiff; and  
7  
8           b) **Chalese Marie Solinger** (“Chalese”), Defendant.

9       4.     The parties involved in this appeal are:

- 10           a) **Chalese Marie Solinger**, Appellant; and  
11           b) **Adam Michael Solinger**, Respondent.

12       5.     The counsel involved in this appeal, so far as they are known at this  
13 time, are:

- 14           a) **Jack W. Fleeman, Esq.**  
15             Nevada Bar No. 10584  
16             **Alicia S. Exley, Esq.**  
17             Nevada Bar No. 14192  
18             PECOS LAW GROUP  
19             8925 South Pecos Road, Suite 14A  
20             Henderson, Nevada 89074

21       6.     Respondent, **Adam Michael Solinger**, is representing himself in the  
22 district court case in Proper Person.

23       7.     Appellant was represented by retained counsel in the district court  
24 proceedings.

25       8.     Appellant is being represented by retained counsel in this appeal.

26       9.     Appellant was not granted leave to proceed *in forma pauperis*.

1       10.   The above-entitled district court proceedings commenced with Adam's  
2       *Complaint for Divorce*, filed January 4, 2019. Chalese's *Answer and*  
3       *Counterclaim* was filed February 4, 2019. There has been extensive litigation and  
4       motion practice in this case. A non-jury trial is currently set for March 29, 2021,  
5       March 30, 2021, March 31, 2021, April 1, 2021, April 2, 2021, and April 5, 2021.  
6

7       11.   The nature of the action at the district court is a divorce involving two  
8       minor children. Chalese initially retained Louis C. Schneider, Esq. to represent her  
9       in the case, which was initiated in January 2019. The first trial dates were set for  
10      October 9, 2019 and October 10, 2019. The case became highly contentious, with  
11      serious allegations being made by both parties. At one point, Mr. Schneider filed a  
12      motion for an order to show cause which ended up being stricken from the Court  
13      record.  
14

15           In August 2019, Mr. Schneider filed a motion to withdraw from Chalese's  
16      case and to adjudicate an attorney's lien. Shortly thereafter, Bruce I. Shapiro, Esq.  
17      and Jack W. Fleeman, Esq. of Pecos Law Group substituted in as counsel for  
18      Chalese. When Messrs. Shapiro and Fleeman substituted in, they immediately  
19      requested a continuance of trial from Adam's counsel. They discovered that little  
20      had been done to prepare for trial in the case, and Chalese was unsure if written  
21      discovery had even been requested from Adam.  
22

23           It turns out that even though it was close to the close of discovery by the  
24      time Pecos Law Group was retained, interrogatories and requests for production  
25      had not been served to Adam and he had not been deposed. Chalese had to file a  
26



1 motion to continue the trial and to extend discovery so that discovery could be  
2 done in advance of trial.

3         Mr. Schneider alleged, in his motion to adjudicate, that Chalese owed him  
4 \$15,425.00. In opposition, Chalese, through new counsel, argued that Mr.  
5 Schneider's fees were not reasonable and that he had not submitted a proper  
6 *Brunzell* affidavit. Counsel pointed out that Chalese had never seen a billing  
7 statement from Mr. Schneider until his motion to adjudicate, that Mr. Schneider  
8 was not tracking his time in a reasonable manner, that he charged an inordinate  
9 amount of time to review standard documents, that he had over-charged for short  
10 documents, and that he had conducted no discovery on Chalese's behalf.  
11

12         On October 9, 2019, the district court heard Mr. Schneider's motion to  
13 adjudicate. The district court awarded Mr. Schneider \$10,875.00 in attorney's  
14 fees. Mr. Schneider was to prepare the order on this hearing, but the order was not  
15 signed by the district court and entered until August 19, 2020. Mr. Schneider did  
16 not prepare a notice of entry of order. This appeal follows.  
17

18         12. This case has not been the subject of an appeal to or original writ  
19 proceeding in the Supreme Court.  
20

21         13. This appeal does not involve child custody or visitation.  
22

23         ...

24         ...

25         ...

26         ...

1 14. This case does involve the possibility of settlement.

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

3 PECOS LAW GROUP

4 

5 **Jack W. Fleeman, Esq.**

6 Nevada Bar No. 10584

7 **Alicia S. Exley, Esq.**

8 Nevada Bar No. 14192

9 8925 South Pecos Road, Suite 14A

10 Henderson, Nevada 89074

11 Attorneys for Defendant

- 1
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Adam M. Solinger	adam@702defense.com
admin email	email@pecoslawgroup.com
Alicia Exley	alicia@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com
Louis Schneider	lcsllawllc@gmail.com

DATED this 2nd day of September, 2020.

Janine Shapiro,  
an employee of PECOS LAW GROUP



1 **ORDR**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 Tel: (702) 388-1851

10 Fax: (702) 388-7406

11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

Date of Hearing: **June 30, 2020**

Time of Hearing: **11:15 a.m.**

22 **ORDER FROM JUNE 30, 2020 HEARING**

23 THIS MATTER came on for hearing before this Court on the 30<sup>th</sup> day of  
24 June, 2020, Plaintiff, **Adam Michael Solinger** ("Adam"), present and represented  
25 by and through his attorney, **Vincent Mayo, Esq.** of THE ABRAMS & MAYO LAW  
26 FIRM; and Defendant, **Chalese Marie Solinger** ("Chalese") present and  
represented by and through her attorney, **Jack W. Fleeman, Esq.**, of PECOS LAW  
GROUP; and the Court being fully advised in the premises and good cause

1 appearing, makes the following findings and orders:

2 IT IS HEREBY ORDERED that the Court will send correspondence to Dr.  
3 Paglini requesting clarification and asking him to specifically state the level of  
4 cooperation from each of party and whether he attributes any non-compliance as  
5 intentional.

6 IT IS FURTHER ORDERED that Chalese is to provide a picture of the  
7 Elderberry Syrup to Adam no later than the end of day on June 30, 2020.

8 IT IS FURTHER ORDERED that Dr. Paglini's child custody evaluation  
9 report shall be due July 24, 2020. Parties are admonished to comply with  
10 obtaining a timely report.

11 IT IS FURTHER ORDERED that all rebuttal experts, if any, shall be  
12 retained and disclosed by July 20, 2020.

13 IT IS FURTHER ORDERED that as a clarification of the court's existing  
14 order, while the Right of First Refusal applies to both parties, the court is limiting  
15 it to a minimum of once per week for Adam to give Chalese the option of  
16 watching the children when he is unavailable. Adam may give Chalese more  
17 time, if he chooses. Adam does not have limitations on how many times Chalese  
18 must offer him the right of first refusal. The parties' behaviors with respect to the  
19 right of first refusal will be an issue at the time of evidentiary hearing.

20 IT IS FURTHER ORDERED that if possible, 24-hour notice should be  
21 given for Right of First Refusal; however, the parties may give less notice if  
22 necessary. For example, if Chalese is offered a shift at work with less than 24-  
23 hour notice, she can provide less notice to Adam. If Adam does not take his Right  
24  
25  
26

1 of First Refusal, daycare is an acceptable option. The receiving parent is  
2 responsible for transport related to the exercise of the Right of First Refusal.

3 IT IS FURTHER ORDERED that CPS records shall be ordered by the  
4 Court regarding Joshua Lloyd's minor child, Arielle.

5 IT IS FURTHER ORDERED that Adam's request to deny Chalese's  
6 visitation with the minor children pending a CPS investigation is DENIED.

7 IT IS FURTHER ORDERED that Adam shall disclose the name of his  
8 employer and division he works for to Mr. Mayo. Mr. Mayo shall disclose this  
9 information to Mr. Fleeman and Ms. Exley. Counsel are to keep this information  
10 confidential, and they are not to provide it to their client.

11 IT IS FURTHER ORDERED that both parties may disclose any discovery  
12 related to child custody up until August 1, 2020. Parties may file motions for any  
13 discovery issues that may arise.

14 IT IS FURTHER ORDERED that Evidentiary Hearing dates are set as  
15 follows, with all days commencing at 9:00 a.m. and set up at 8:30 a.m.:

16 Day 1 – August 20, 2020

17 Day 2 – August 21, 2020

18 Day 3 – August 24, 2020

19 Day 4 – August 25, 2020

20 Day 5 – August 27, 2020

21 Day 6 – August 28, 2020

22 IT IS FURTHER ORDERED that each side will have 45 minutes of closing  
23 arguments, which will be held via Blue Jeans on September 1, 2020 at 1:30 p.m.

1 IT IS FURTHER ORDERED that, if necessary, Chalese may appear via  
2 Blue Jeans for the Evidentiary Hearing dates.

3 IT IS FURTHER ORDERED that Share Screen can be used for audio-  
4 visual exhibits for anyone appearing via Blue Jeans. The Court can also set up the  
5 Mirror application for electronic display in court as well.

6 IT IS FURTHER ORDERED that Mr. Fleeman shall prepare the order, with  
7 Mr. Mayo having seven days to review and approve as to form and content.  
8

9 DATED this 10 day of SEPTEMBER, 20 20.

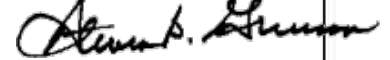
10  
11   
DISTRICT COURT JUDGE hm

12 Submitted by:  
13 PECOS LAW GROUP

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

14  
15 /s/ Jack W. Fleeman  
16 **Jack W. Fleeman, Esq.**  
Nevada Bar No. 010584  
17 **Alicia S. Exley, Esq.**  
Nevada Bar No. 014192  
18 8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
19 (702) 388-1851  
Attorneys for Defendant

20  
21 **Vincent Mayo, Esq.**  
Nevada Bar No. 008564  
22 6252 S. Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
23 (702) 222-4021  
Attorney for Plaintiff



1 **NEOJ**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

11 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

12 Attorneys for Defendant

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

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


Dept No. **I**

21 **NOTICE OF ENTRY OF ORDER**

22 TO: **Adam Michael Solinger**, Plaintiff in Proper Person:

23 **YOU WILL PLEASE TAKE NOTICE** that the “**Order from June 30,**  
24 **2020 Hearing**” was entered in the above-captioned case on the **10<sup>th</sup>** day of  
25 **September 2020**, by filing with the clerk. A true and correct copy of said Order is  
26 attached hereto and made a part hereof.

**DATED** this 10<sup>th</sup> day of September 2020.

23 **Alicia S. Exley, Esq.**

24 Nevada Bar No. 14192

25 8925 South Pecos Road, Suite 14A

26 Henderson, Nevada 89074

Attorney for Defendant



1 **CERTIFICATE OF SERVICE**

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


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

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

13 Adam M. Solinger	adam@702defense.com
14 admin email	email@pecoslawgroup.com
15 Alicia Exley	alicia@pecoslawgroup.com
16 Jack Fleeman	jack@pecoslawgroup.com
17 Angela Romero	angela@pecoslawgroup.com

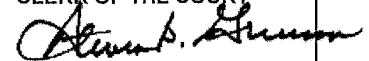
18 A courtesy copy has also been sent to: attorneyadamsolinger@gmail.com.

19  
20 **DATED** this 10<sup>th</sup> day of September 2020.

21  
22 

23 **Allan Brown**

24 An employee of PECOS LAW GROUP



1 **ORDR**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 Tel: (702) 388-1851

10 Fax: (702) 388-7406

11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

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25 by and through his attorney, **Vincent Mayo, Esq.** of THE ABRAMS & MAYO LAW  
26 FIRM; and Defendant, **Chalese Marie Solinger** ("Chalese") present and  
represented by and through her attorney, **Jack W. Fleeman, Esq.**, of PECOS LAW  
GROUP; and the Court being fully advised in the premises and good cause

1 appearing, makes the following findings and orders:

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5 Mirror application for electronic display in court as well.

6 IT IS FURTHER ORDERED that Mr. Fleeman shall prepare the order, with  
7 Mr. Mayo having seven days to review and approve as to form and content.  
8

9 DATED this 10 day of SEPTEMBER, 2020.

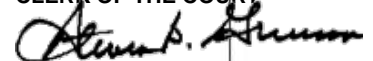
10   
11 DISTRICT COURT JUDGE hm

12 Submitted by:  
13 PECOS LAW GROUP

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

16 /s/ Jack W. Fleeman  
17 **Jack W. Fleeman, Esq.**  
18 Nevada Bar No. 010584  
19 **Alicia S. Exley, Esq.**  
20 Nevada Bar No. 014192  
21 8925 South Pecos Road, Suite 14A  
22 Henderson, Nevada 89074  
23 (702) 388-1851  
24 *Attorneys for Defendant*

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



1 LOUIS C. SCHNEIDER, ESQ.  
2 Nevada Bar No.: 9683  
3 430 So. Seventh St.  
4 Las Vegas, Nevada 89101  
5 T: 702-435-2121  
6 [lcsllawllc@yahoo.com](mailto:lcsllawllc@yahoo.com)  
7 Attorney for Defendant

8 **DISTRICT COURT – FAMILY DIVISION**  
9 **CLARK COUNTY, NEVADA**

10 ADAM M. SOLINGER,

11 Plaintiff,

12 vs.

13 CHALISE M. SOLINGER,

14 Defendant,

Case No.: D-19-582245-D

Dept. No.: I

15 **NOTICE OF ENTRY OF**  
16 **ORDER**

17 TO ALL INTERESTED PARTIES and their legal counsel, If applicable:

18 PLEASE TAKE NOTICE that the Order from the hearing held October 9<sup>th</sup>,  
19 2019 was entered on August 19, 2020; a true and correct copy is attached hereto.  
20

21 Dated this 21<sup>st</sup> day of September, 2020.

22 /s/ Louis C. Schneider

23 LOUIS C. SCHNEIDER, ESQ.  
24 Nevada Bar No.: 9683  
25 430 South 7<sup>th</sup> St.  
26 Las Vegas, Nevada, 89101  
27 Ph:(702) 435-2121  
28

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Louis C. Schneider, Esq., and that  
3  
4 on the 21<sup>st</sup> day September, 2020, I served a true and correct copy of the above and  
5 forgoing **NOTICE OF ENTRY OF ORDER** on all parties addressed as shown  
6 below.  
7

8  
9 X Via Electronic Service [NEFR Rule 9]  
10

11 \_\_\_\_\_ Via facsimile [EDCR 7.26(a)]  
12

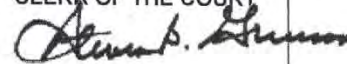
13 \_\_\_\_\_ Via U.S. Mail [NRCP 5(b)]  
14

15 \_\_\_\_\_ Hand Delivered  
16

17 Jack W. Fleeman, Esq.  
18 Nevada Bar Number 10584  
19 PECOS LAW GROUP  
20 8925 South Pecos Road Suite 14A  
21 Henderson, Nevada 89074  
22 Ph: 702.388.1851  
Email: Bruce@pecoslawgroup.com  
Attorney for Defendant

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

23  
24 /s/ Mindy Moore  
25 An Employee of Louis C. Schneider, Esq.  
26  
27  
28



1 LOUIS C. SCHNEIDER, ESQ.  
2 Nevada Bar Number 9683  
3 430 South 7<sup>th</sup> Street  
4 Las Vegas, Nevada 89101  
5 T: (702) 435-2121  
6 F: (702) 431-3807  
7 Attorney for Defendant  
8 lcsllawllc@yahoo.com

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

10 ADAM M. SOLINGER,  
11 Plaintiff,

CASE NO.: D-19-582245-D  
DEPT: 1

13 vs.

15 CHALISE M. SOLINGER,  
16 Defendant.

**ORDER FROM THE HEARING HELD OCTOBER 9, 2019**

20 COMES NOW, LOUIS SCHNEIDER, ESQ. of the LAW OFFICES OF LOUIS C.  
21 SCHNEIDER, LLC, appearing on behalf of the LAW OFFICES OF LOUIS C.  
22 SCHNEIDER, LLC, JACK W. FLEEMAN, ESQ., present for BRUCE I SHAPIRO,  
23 ESQ., on behalf of the Defendant, who was not present, and VINCENT MAYO, ESQ.  
24 appearing on behalf of the Plaintiff, who was present with his counsel, the parties having  
25 come before this Court on October 9, 2019, and respectfully submits this Order.  
26  
27  
28



1 After a review of the pleadings and papers on file herein, the Points and Authorities  
2 submitted herewith, and any oral argument or testimony adduced at the hearing of this  
3 motion herein, this Court orders as follows:  
4

5 **FINDINGS**

6 **THE COURT FINDS** that *Fredianelli v. Fine Carman Price*, 133 Nev. 586, 402  
7 P.3d 1254 (2017) is the controlling law in this case.  
8

9 **THE COURT FURTHER FINDS** that Mr. Schneider's motion to withdraw and  
10 adjudicate attorney's lien, made pursuant to NRS 18.015, was timely filed and properly  
11 served. *Video citation from hearing held October 9, 2019, starting at 9:16:54.*  
12

13 **THE COURT FURTHER FINDS** that the billing statement Mr. Schneider  
14 provided is sufficiently detailed, and is satisfactory to the Court, as a basis upon which to  
15 award attorney's fees. *Video citation 9:17:48.*  
16

17 **THE COURT FURTHER FINDS** that an award of attorney's fees to Mr.  
18 Schneider in the amount of \$10,875 is reasonable. *Video citation 9:22:04, and 9:22:24.*  
19

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

**ORDER**

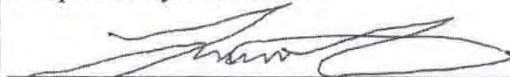
**IT IS HEREBY ORDERED** that Mr. Schneider is awarded attorney's fees in the amount of \$10,875. Such award is reduced to judgment, enforceable by any legal means.

**IT IS FURTHER ORDERED** that the execution of this judgment is stayed pending resolution at trial.

Dated this 19 day of AUGUST, 2020.

  
DISTRICT COURT JUDGE *MC*

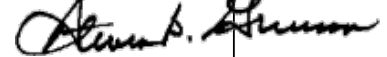
Respectfully submitted:

  
LOUIS C. SCHNEIDER, ESQ.  
Nevada Bar Number 9683  
430 S. 7<sup>th</sup> St.  
Las Vegas, NV 89101  
(702) 435-2121  
lcsllawllc@yahoo.com

Approved as to form and content:

\_\_\_\_\_  
Jack W. Fleeman, Esq.  
Nevada Bar Number 10584  
PECOS LAW GROUP  
8925 South Pecos Road Suite 14A  
Henderson, Nevada 89074  
Ph: 702.388.1851  
Email: Bruce@pecoslawgroup.com  
Attorney for Defendant

\_\_\_\_\_  
Vincent Mayo, Esq.  
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THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Ph: 702. 222-4021  
Email: VMGroup@theabramslawfirm.com  
Attorney for Plaintiff



**MOT**

Adam M. Solinger  
7290 Sea Anchor Ct  
Las Vegas, Nevada 89131  
Tel: (702) 222-4021  
Email: attorneyadamsolinger@gmail.com

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>Hearing Requested</b>
	)	
Defendant.	)	

**MOTION TO CLARIFY THE COURT'S JUNE 30<sup>TH</sup> ORDER  
AFTER HEARING**

**NOW INTO COURT** comes Plaintiff, ADAM MICHAEL SOLINGER, and hereby submits his MOTION TO CLARIFY THE COURT'S JUNE 30th ORDER AFTER HEARING.

This Motion is made and based upon the attached Points and Authorities, the Declaration of Plaintiff attached hereto, and all papers and pleadings on file herein.

Dated Wednesday, October 07, 2020.

Respectfully Submitted,

/s/ Adam M. Solinger

Adam M. Solinger

1                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2   **I.     STATEMENT OF FACTS**

3           During the June 30th hearing, the issue of Chalese's use of  
4 elderberry syrup came up and was addressed by the Court. Without  
5 getting into the specifics of the issue again, it is beyond dispute that during  
6 the hearing the Court ordered that Chalese provide a picture of the  
7 elderberry syrup she was giving the children "immediately." Chalese's  
8 counsel submitted an order that allowed vastly more time to submit the  
9 required picture. Adam submitted an order with the correct ruling by the  
10 Court with a time stamp that corresponded to the JAVS recording. Putting  
11 aside the countermotion for sanctions based upon this same conduct that  
12 has not been ruled on, the court staff emailed Adam and asked that he  
13 resubmit his order with one minor change, but did not note any changes  
14 to the timeframe of when the elderberry syrup picture was to be  
15 submitted.

16           Adam was surprised to learn that the Court signed Chalese's order  
17 that allowed for vastly more time to submit the picture of the elderberry  
18 syrup. This motion is intended to clarify the change between what the  
19 Court ordered at the hearing and what the Court signed for a written order  
20 as it is Adam's belief the Court mistakenly signed the wrong order.

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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 TO CLARIFY THE COURT’S JUNE 30th ORDER AFTER HEARING*.

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 7th day of October 2020.

/s/ Adam M. Solinger  
ADAM MICHAEL SOLINGER

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing MOTION TO CLARIFY COURT’S  
JUNE 30th ORDER AFTER HEARING was filed electronically with the  
Eighth Judicial District Court in the above-entitled manner, on  
Wednesday October 7, 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/ Adam M. Solinger  
ADAM MICHAEL SOLINGER

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. 1

**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 filed with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

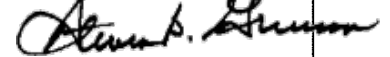
**Step 3.** Add the filing fees from Step 1 and Step 2.

The total filing fee for the motion/opposition I am filing with this form is:							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
\$0	\$25	\$57	\$82	\$129	\$154		

Party filing Motion/Opposition: Adam M. Solinger Date 10/7/2020

Signature of Party or Preparer /s/ Adam M. Solinger





1 **MOT**

2 **Jack W. Fleeman, Esq.**

3 Nevada Bar No. 10584

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 Tel: (702) 388-1851

10 Fax: (702) 388-7406

11 [Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)

12 [Alicia@pecoslawgroup.com](mailto:Alicia@pecoslawgroup.com)

13 Attorneys for Defendant

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

17 **Adam Michael Solinger,**

18 Plaintiff,

19 vs.

20 **Chalese Marie Solinger,**

21 Defendant.

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

Dept No. **I**

**ORAL ARGUMENT REQUESTED**  
**YES**

22 **MOTION FOR CLARIFICATION AND MODIFICATION OF COURT RELEASE**  
23 **REGARDING CUSTODY EVALUATION**  
24 **AND FOR SANCTIONS AND FEES AGAINST PLAINTIFF**


25 COMES NOW Defendant, **Chalese Marie Solinger**, by and through her  
26 attorneys of record, **Jack W. Fleeman, Esq.** and **Alicia S. Exley, Esq.**, of PECOS  
LAW GROUP, hereby files this *Motion for Clarification and Modification of Court*

1 *Release Regarding Custody Evaluation and for Sanctions and Fees Against*  
2 *Plaintiff.*

3 This motion is made and based on all the papers and pleadings on file and  
4 the declaration of counsel and argument contained herein  
5

6 DATED this 7 day of October, 2020.

7 PECOS LAW GROUP

8   
9  
10 **Jack W. Fleeman, Esq.**  
Nevada Bar No. 10584  
11 **Alicia S. Exley, Esq.**  
Nevada Bar No. 14192  
12 8925 South Pecos Road, Suite 14A  
Henderson, NV 89074  
13 (702) 388-1851 Tel.  
14 *Attorneys for Defendant*

15  
16 **POINTS AND AUTHORITIES**

17 **I.**

18 **FACTS**

19 1. In December 2019, the Court ordered that a child custody evaluation  
20 would be conducted in this case. This order was reiterated in February 2020, and  
21 Dr. Paglini was chosen to conduct a child custody evaluation.  
22

23 2. At the June 30, 2020 hearing, the court set a deadline to retain and  
24 disclose rebuttal experts.

1           3.     The Court subsequently signed an *Order to Continue Trial*, which  
2 was filed on August 10, 2020, extending the deadline for rebuttal expert witness  
3 disclosures and reports to February 26, 2021.

4           4.     Dr. Paglini's report was completed in early September 2020.

5           5.     Prior to receiving the report, the court required that counsel sign a  
6 release which stated that no copies of the report would be made or release and that  
7 "no secondary dissemination will take place without express permission of the  
8 Court."<sup>1</sup>

9  
10          6.     EDCR 5.304, which governs outsource child custody evaluation  
11 reports, states, in pertinent part: "Only the parties, their attorneys, and such staff  
12 *and experts* as those attorneys deem necessary are entitled to read or have copies  
13 of the written reports" (emphasis added).

14  
15          7.     As the release appears to conflict with the rule, in an abundance of  
16 caution and after discussion with at least one other Family Law Specialist outside  
17 of counsel's firm, Chalese's counsel contacted this Court's law clerk on October  
18 5, 2020 via email, copying Mr. Solinger, to request a minute order clarifying that  
19 Dr. Paglini's custody evaluation may be disseminated to consulting/rebuttal  
20 experts.  
21

22  
23  
24           <sup>1</sup> Under the language of the release, the prohibited dissemination only applies to counsel.  
25 Mr. Solinger is not counsel in this matter, he is a litigant. It is unknown if Mr. Solinger signed  
26 the same release or if it was modified so that it fairly applies to him.

1           8.     On October 6, 2020, Mr. Solinger responded to the email and advised  
2 the court that there were “numerous issues with this request [to clarify] that need  
3 to be briefed before a decision is made.” *See Emails* submitted as Exhibit “A.”

4  
5           9.     Following Mr. Solinger’s email to the court, Mr. Fleeman sent an  
6 email to Mr. Solinger stating:

7                   Please send us what issues those are via an EDCR 5.501  
8                   letter so we can address them immediately. I am not  
9                   aware what issues there could possibly be with disclosing  
10                  a report to a potential expert. The rule specifically allows  
11                  it. Again, I look forward to your letter which I imagine  
12                  should be immediately forthcoming.

13           *See Emails* submitted as Exhibit “B.”

14           10.    Mr. Solinger responded to Mr. Fleeman’s request to explain what  
15 issues he had regarding a review of the report by experts. Mr. Solinger’s sole  
16 issue, according to his email was that he did not want the report to go to numerous  
17 potential experts and being widely disseminated.

18           11.    Mr. Solinger then went on to complain that the court’s scheduling  
19 order sets the rebuttal expert disclosure and report deadlines for the same day,  
20 which was completely irrelevant to the issue.

21           12.    Next, Mr. Solinger explained that because he believes Chalese  
22 “defamed” him by discussing the prior child pornography issue with Dr. Paglini in  
23 the report he objected to having the “false and extremely defamatory report being  
24 circulated to anyone outside of who actually has access currently.”

1           13. Mr. Solinger finally stated that he “won’t agree to the release of the  
2 report until the above is handled.” He then warned that any dissemination by our  
3 firm “without a fix...will be considered an adoption and ratification of the same  
4 by” our firm and he would seek future damages from our firm. *See* Emails  
5 submitted as Exhibit “C.”  
6

7           14. Mr. Fleeman responded to Mr. Solinger’s stating:

8                   None of your issues are valid reasons for not allowing us  
9 to provide the report to a potential expert. In fact, I am  
10 putting you on notice that your arguments are frivolous.  
11 There is zero basis to prevent us from seeking a review  
12 by an expert. The rule allows it, as will the court.

13                   If you persist in this frivolous position I will seek  
14 sanctions. You have until tomorrow morning to  
15 reconsider.

16                   As for the discovery deadline issue, the proper process  
17 would be to ask us if we will stipulate to modify the  
18 timeline.

19 *See* Exhibit “C.”

20           15. ***Mr. Solinger’s response further demonstrates his complete inability***  
21 ***to act reasonably in this case.*** Mr. Solinger stated:

22                   (A) ***“You must have a very strange definition of***  
23 ***frivolous if you believe my objection is frivolous but you***  
24 ***think your complaint against Margaret Pickard is not.”***<sup>2</sup>

---

25           <sup>2</sup> It is notable that Mr. Solinger’s commentary about not being frivolous is an  
26 unambiguously frivolous remark. Unfortunately, it is not uncommon, as Mr. Solinger self-  
righteously and routinely takes unreasonable actions and positions in this case.

1  
2 (B) "I'm going to take the appropriate action necessary to  
3 protect my reputation and hold anyone, including you  
4 and your firm, responsible for disseminating knowing  
5 falsehoods."<sup>3</sup>

6 (C) "If you'd like to propose a modification to the current  
7 discovery deadlines, I'm open to your suggestions,<sup>4</sup> but  
8 given that it's been like pulling teeth just to find the  
9 starting line for negotiation purposes, I'm not holding my  
10 breath."<sup>5</sup>

11 See Exhibit "C" (emphasis added).

12 16. Mr. Solinger followed up his email to Mr. Fleeman with an email to  
13 the court. In that email, he stated that there needs to be a hearing so he can  
14

15 <sup>3</sup> Mr. Solinger continues to repeat the ridiculous threat of holding Pecos Law Group and  
16 Mr. Fleeman personally liable for supposed comments that Chalese made to a child custody  
17 evaluator. This is beyond ridiculous and frivolous.

18 <sup>4</sup> This is just another non-sensical statement by Mr. Solinger. It was Mr. Solinger who  
19 brought up that he believed the discovery timeline was problematic. See Exhibit "C." Mr.  
20 Fleeman had simply asked Mr. Solinger to suggest a modification so the parties could  
21 potentially stipulate to a modification of the discovery timeline. But Mr. Solinger could not do  
22 that. Instead, he responded that he would be open to suggestions from counsel. Again, it is Mr.  
23 Solinger, not Chalese who apparently wants some modifications, so why is he asking counsel to  
24 make suggestions?

25 <sup>5</sup> Mr. Solinger's claim that it is like pulling teeth to "find a starting line for negotiation"  
26 is just another example of his inability to function as his own lawyer with any semblance of  
reasonableness. Counsel asked Mr. Solinger if he would be amenable to a settlement  
conference to try to settle issues in the case. Mr. Solinger then asked what issues were open for  
trial. Counsel responded that "all issues" were open for trial and settlement. Mr. Solinger  
followed that by repeatedly asking what specific issues were open – and would not take the  
response that "all" issues are open for discussion for an answer. When Mr. Fleeman then  
attempted to ask Mr. Solinger what issues he believed were open for discussion, Mr. Solinger  
finally stated "The only thing that warrants any type of discussion is what settling custody looks  
like." Mr. Fleeman responded by asking for a proposal on the custody issue if that is what Mr.  
Solinger believed was the only thing warranting discussion. Mr. Solinger has never responded  
to that request, and it is not believed he will ever respond with anything close to reasonable. See  
Emails submitted as Exhibit "D."

1 address the alleged “defamatory” comments, which he considers “independently  
2 actionable and defamation per se.”

## 3 II.

### 4 ARGUMENT

#### 5 A. THE COURT SHOULD CLARIFY THE RELEASE PURSUANT TO 6 THE LOCAL RULE.

7 EDCR 5.304(a) states, in relevant part:

8  
9 A written child interview report or outsource evaluation  
10 report (including exhibits), prepared by the Family  
11 Mediation Center, an outsource evaluator, or a CASA  
12 shall be delivered to the judge in chambers. Only the  
13 parties, their attorneys, and such staff and *experts as  
those attorneys deem necessary are entitled to read or  
have copies of the written reports*, which are confidential  
except as provided by rule, statute, or court order.

14 (Emphasis added).

15 The rule is unambiguous that “experts as...attorneys deem necessary are  
16 entitled to read and have copies of the written reports.” Despite this clear  
17 language, it appears the Court’s release technically, and very likely  
18 unintentionally, prohibits the dissemination of the report in this case to any experts  
19 that undersigned counsel would like to have review the report. Upon noticing this  
20 apparent error, Chalese’s counsel attempted to have the court issue a minute order  
21 to clarify and correct the release so that it complies with the rule.  
22  
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1 As detailed in the facts above, Mr. Solinger has taken the unreasonable and  
2 frivolous position that the report should not be released to any potential experts  
3 until it is somehow corrected. Mr. Solinger's position is that the report contains  
4 defamatory statements against him, and that he is permitted to object to its  
5 dissemination to potential experts on the grounds that he could somehow be  
6 harmed.

8 There is no legal basis for Mr. Solinger's frivolous position. Chalese is  
9 entitled to retain any consulting or rebuttal experts she wants in this case.  
10 Therefore, the court should clarify its release through the issuance of an order that  
11 clarifies that the parties shall follow EDCR 5.304(a) with regard to who, including  
12 experts, may be provided copies of the report.

14 **B. MR. SOLINGER SHOULD BE SANCTIONED AND ORDERED TO**  
15 **PAY CHALESE'S REASONABLE ATTORNEY'S FEES FOR HIS**  
16 **FRIVOLOUS POSITIONS.**

17 EDCR 7.60(b) states:

18 (b) *The court may*, after notice and an opportunity to be  
19 heard, *impose upon* an attorney or *a party any and all*  
20 *sanctions which may, under the facts of the case, be*  
21 *reasonable, including the imposition of fines, costs or*  
22 *attorney's fees when an attorney or a party without just*  
23 *cause:*

24 (1) *Presents to the court a motion or an*  
25 *opposition to a motion which is obviously frivolous,*  
26 *unnecessary or unwarranted.*

(2) Fails to prepare for a presentation.

(3) *So multiplies the proceedings in a case as to*  
*increase costs unreasonably and vexatiously.*



- 1 (4) Fails or refuses to comply with these rules.  
2 (5) Fails or refuses to comply with any order of  
3 a judge of the court.

4 It is anticipated that Mr. Solinger will submit an obviously frivolous  
5 position via opposition, as he has clearly indicated that he will. And even if that  
6 is not the case, and Mr. Solinger somehow does not file an opposition, Mr.  
7 Solinger's position thus far has needlessly, unreasonably, and vexatiously  
8 multiplied the proceedings and costs in this case – resulting in the need for this  
9 motion.

10 Mr. Solinger's vexatious and unreasonable attitude is readily apparent in his  
11 response to Mr. Fleeman putting him on notice that his objection to a clarification  
12 of the release was frivolous. Mr. Fleeman simply tried to point out to Mr.  
13 Solinger that the request for clarification followed the mandatory rule. But instead  
14 of any reasonable response or behavior, Mr. Solinger made personal remarks  
15 against Mr. Fleeman, detailed above, that have absolutely nothing to do with this  
16 case. This behavior is unfortunately how Mr. Solinger, who is too close to this  
17 case, chooses to operate as a pro per litigant. It must be noted, however, that Mr.  
18 Solinger is not just a pro per litigant – he is a licensed attorney who knows better.  
19 His commentary and his positions, especially considering his knowledge as an  
20 attorney, warrant sanctions. Without sanctions, Mr. Solinger will simply continue  
21 to act in an inappropriate and unreasonable manner in this case.  
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1 Finally, Chalese requests that this issue of sanctions, fees, and costs be  
2 deferred until the time of trial in this case.

3  
4 **III.**

5 **CONCLUSION**

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

8 1. An Order clarifying the court's release by way of an order stating that  
9 the parties shall follow EDCR 5.304(a) with regard to who, including experts, may  
10 be provided copies of the report;

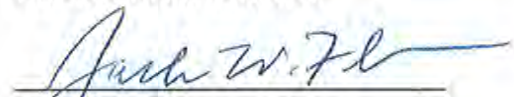
11 2. An Order sanctioning Mr. Solinger for his frivolous positions;

12 3. An Order awarding Chalese attorney's fees for having to respond to  
13 Mr. Solinger's frivolous positions; and

14 4. For other and further relief as the Court deems proper.

15 DATED this 1 day of October, 2020.

16  
17 PECOS LAW GROUP

18 

19 **Jack W. Fleeman, Esq.**

20 Nevada Bar No. 10584

**Alicia S. Exley, Esq.**

21 Nevada Bar No. 14192

22 8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

23 Attorneys for Defendant

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1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW  
3 GROUP, and that on this 7<sup>th</sup> day of October, 2020, I served a copy of  
4 the foregoing *Motion for Clarification and Modification of Court Release*  
5 *Regarding Custody Evaluation and for Sanctions and Fees Against Plaintiff* as  
6 follows:

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


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

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

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

15 Adam M. Solinger	adam@702defense.com
16 admin email	email@pecoslawgroup.com
17 Alicia Exley	alicia@pecoslawgroup.com
18 Jack Fleeman	jack@pecoslawgroup.com
19 Angela Romero	angela@pecoslawgroup.com

20 A courtesy copy has also been sent to: attorneyadamsolinger@gmail.com.

21 

22 An employee of PECOS LAW GROUP



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

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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.

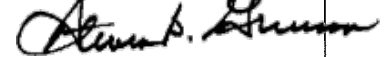
Step 3. Add the filing fees from Step 1 and Step 2.

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: Chalese Solinger Date 10/7/2020

Signature of Party or Preparer Alvin



EXHS  
**Jack W. Fleeman, Esq.**  
Nevada Bar No. 10584  
**Alicia S. Exley, Esq.**  
Nevada Bar No. 14192  
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[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:

Time of Hearing:

**EXHIBITS TO**  
**MOTION FOR CLARIFICATION AND MODIFICATION OF COURT RELEASE**  
**REGARDING CUSTODY EVALUATION**  
**AND FOR SANCTIONS AND FEES AGAINST PLAINTIFF**

///

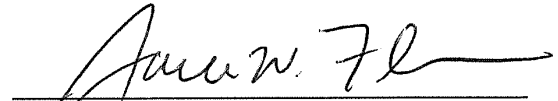
///

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EXHIBIT A:	Email requesting minute order and responses, October 5 and 6, 2020	DEF001472 – DEF001474
EXHIBIT B:	Email to Plaintiff from Mr. Fleeman, dated October 6, 2020	DEF001475 – DEF001476
EXHIBIT C:	Emails between Plaintiff and Mr. Fleeman, dated October 6, 2020	DEF001477 – DEF001479
EXHIBIT D:	Emails re: Discussion in Anticipation of Settlement Conference	DEF001480 – DEF001484

DATED this 7 day of October 2020.

PECOS LAW GROUP



**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

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP,  
3 and that on this 7<sup>th</sup> day of October 2020, I served a copy of "*Exhibits to Motion for*  
4 *Clarification and Modification of Court Release Regarding Custody Evaluation and*  
5 *for Sanctions and Fees Against Plaintiff*" as follows:  
6

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

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

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

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

14 Adam M. Solinger	adam@702defense.com
15 admin email	email@pecoslawgroup.com
16 Alicia Exley	alicia@pecoslawgroup.com
17 Jack Fleeman	jack@pecoslawgroup.com
18 Angela Romero	angela@pecoslawgroup.com

19  
20  
21 A courtesy copy has also been sent to: attorneyadamsolinger@gmail.com.

22 

23 \_\_\_\_\_  
24 Allan Brown,  
25 An employee of PECOS LAW GROUP  
26  
27  
28



# EXHIBIT A

**Jack Fleeman**

---

**From:** Adam Solinger <attorneyadamsolinger@gmail.com>  
**Sent:** Tuesday, October 6, 2020 10:43 AM  
**To:** Jack Fleeman  
**Cc:** Zavala, Azucena; Farrales, Anna; Alicia Exley  
**Subject:** Re: Solinger v. Solinger

It's been less than an hour since I've voiced an objection and I have other work that takes priority at this time. I will send a letter that Mr. Fleeman has requested pursuant to EDCR 5.501 when I am able to, given that this is not an emergency issue.

On Tue, Oct 6, 2020 at 10:29 AM Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)> wrote:

I am not aware what issues are bothering Mr. Solinger – especially since our local court rules explicitly provide for such dissemination. I wish I could give some insight on this, but unfortunately we have not been enlightened by Mr. Solinger as to what his “numerous issues” are. So, our position remains that we would appreciate if the court would clarify its intent with a minute order, if possible.

Sincerely,

*Jack W. Fleeman* / ATTORNEY AT LAW

STATE BAR OF NEVADA CERTIFIED FAMILY LAW SPECIALIST



8925 SOUTH PECOS ROAD, SUITE 14A

HENDERSON, NEVADA 89074

PHONE: (702) 388-1851

FAX: (702) 388-7406

EMAIL: [JACK@PECOSLAWGROUP.COM](mailto:JACK@PECOSLAWGROUP.COM)

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**From:** Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)>  
**Sent:** Tuesday, October 6, 2020 9:53 AM  
**To:** Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)>  
**Cc:** ZavalaA@clarkcountycourts.us; Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)>; Farrales, Anna <[DEPTILC@clarkcountycourts.us](mailto:DEPTILC@clarkcountycourts.us)>  
**Subject:** Re: Solinger v. Solinger

Dear Suzanna,

From my perspective, this is not a matter that is appropriate to handle via minute order. There are numerous issues with this request that need to be briefed before a decision is made.

On Mon, Oct 5, 2020 at 5:19 PM Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)> wrote:

Dear Suzanna,

Prior to receiving Dr. Paglini's report in this matter, we signed a release stating that "no secondary dissemination will take place without express permission of the Court." EDCR 5.304, however, permits dissemination for consulting/rebuttal expert review, and the Judge provided a deadline for rebuttal reports. We are therefore requesting a minute order clarifying that the parties may disseminate Dr. Paglini's report to consulting/rebuttal experts for review.

Sincerely,

*Alicia Exley* | ATTORNEY



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HENDERSON, NEVADA 89074

PHONE: (702) 388-1851

FAX: (702) 388-7406

EMAIL: [ALICIA@PECOSLAWGROUP.COM](mailto:ALICIA@PECOSLAWGROUP.COM)

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# EXHIBIT B



**Jack Fleeman**

---

**From:** Jack Fleeman  
**Sent:** Tuesday, October 6, 2020 10:09 AM  
**To:** Adam Solinger; Alicia Exley  
**Cc:** Allan Brown  
**Subject:** RE: Solinger v. Solinger

Mr. Solinger,

Please send us what issues those are via an EDCR 5.501 letter so we can address them immediately. I am not aware what issues there could possibly be with disclosing a report to a potential expert. The rule specifically allows it. Again, I look forward to your letter which I imagine should be immediately forthcoming.

*Jack W. Fleeman* / ATTORNEY AT LAW  
STATE BAR OF NEVADA CERTIFIED FAMILY LAW SPECIALIST



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**From:** Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)>  
**Sent:** Tuesday, October 6, 2020 9:53 AM  
**To:** Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)>  
**Cc:** ZavalaA@clarkcountycourts.us; Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)>; Farrales, Anna <[DEPTILC@clarkcountycourts.us](mailto:DEPTILC@clarkcountycourts.us)>  
**Subject:** Re: Solinger v. Solinger

Dear Suzanna,

From my perspective, this is not a matter that is appropriate to handle via minute order. There are numerous issues with this request that need to be briefed before a decision is made.

On Mon, Oct 5, 2020 at 5:19 PM Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)> wrote:

Dear Suzanna,

Prior to receiving Dr. Paglini's report in this matter, we signed a release stating that "no secondary dissemination will take place without express permission of the Court." EDCR 5.304, however, permits dissemination for consulting/rebuttal expert review, and the Judge provided a deadline for rebuttal reports. We are therefore requesting a minute order clarifying that the parties may disseminate Dr. Paglini's report to consulting/rebuttal experts for review.

Sincerely,

*Alicia Exley* | ATTORNEY



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FAX: (702) 388-7406

EMAIL: [ALICIA@PECOSLAWGROUP.COM](mailto:ALICIA@PECOSLAWGROUP.COM)

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# EXHIBIT C



**Jack Fleeman**

---

**From:** Jack Fleeman  
**Sent:** Wednesday, October 7, 2020 11:06 AM  
**To:** Jack Fleeman  
**Subject:** Re: Letter Pursuant to EDCR 5.501 RE: Release of Child Custody Report

**From:** Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)>  
**Date:** October 6, 2020 at 4:06:19 PM PDT  
**To:** Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)>  
**Cc:** Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)>  
**Subject:** Re: Letter Pursuant to EDCR 5.501 RE: Release of Child Custody Report

You must have a very strange definition of frivolous if you believe my objection is frivolous but you think your complaint against Margaret Pickard is not.

Your table-pounding hard-line tactics might work against lay people representing themselves, but they don't give me pause in the slightest. I'm not going to be sanctioned for not wanting a report with statements that would be deemed defamation *per se* being disseminated to some unknown number of potential rebuttal experts. You do what you think you need to do for your client. I'm going to take the appropriate action necessary to protect my reputation and hold anyone, including you and your firm, responsible for disseminating knowing falsehoods.

If you'd like to propose a modification to the current discovery deadlines, I'm open to your suggestions, but given that it's been like pulling teeth just to find the starting line for negotiation purposes, I'm not holding my breath.

On Tue, Oct 6, 2020 at 3:09 PM Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)> wrote:

None of your issues are valid reasons for not allowing us to provide the report to a potential expert. In fact, I am putting you on notice that your arguments are frivolous. There is zero basis to prevent us from seeking a review by an expert. The rule allows it, as will the court.

If you persist in this frivolous position I will seek sanctions. You have until tomorrow morning to reconsider.

As for the discovery deadline issue, the proper process would be to ask us if we will stipulate to modify the timeline.

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 Oct 6, 2020, at 3:00 PM, Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)> wrote:

I have a few issues releasing this report to anyone outside of your office and myself at this time. First, Alicia stated that they have been through numerous potential rebuttal experts and that your office had been unable to find someone able and willing to act as your expert. Given that you have not yet noticed an expert, I don't want the report going out to numerous potential experts and being widely disseminated.

That leads to the issue with the discovery deadlines as currently set. I know your response to the above will be that you don't have to let me know who your potential rebuttal expert is until the deadline. That is absolutely correct, but the Court's scheduling order has obvious issues in that every discovery deadline falls on the same day. That was an obvious oversight that needs to be addressed if you intend to actually call a rebuttal expert so that there's time for me to take any steps I deem necessary to prepare for trial.

Relatedly, your client seems to persist in defaming me in reference to CSAM allegations. The report is replete with her continued, actionable, lies. You know they're false because I had to fight like hell to get your expert to release the emails showing that your client and her former attorney lied through their teeth constantly. You knew they were false in November of last year, well before Dr. Paglini was even chosen as the custody evaluator in this case. I will not agree to a false and extremely defamatory report being circulated to anyone outside of who actually has access currently.

There are a number of other inaccuracies, courtesy of your client, with the report but I can handle those separately via other means. I won't agree to the release of the report until the above is handled. In that vein, any dissemination of your client's defamatory comments without a fix regarding her purposeful deception by your firm will be considered an adoption and ratification of the same by your firm and any future

requests for damages will be similarly sought for your dissemination.

--  
Adam M. Solinger

# EXHIBIT D

**Jack Fleeman**

---

**From:** Jack Fleeman  
**Sent:** Tuesday, October 6, 2020 10:12 AM  
**To:** Adam Solinger  
**Cc:** Alicia Exley  
**Subject:** RE: Discussion in Anticipation of Settlement Conference.

Do you think property issues are fully resolved? Attorney's Fees? Alimony? Waste issues? Etc.? Just custody is open for discussion? If that is the case, why don't you send over what your proposal is on that. Perhaps we don't need a conference to get custody settled, if that is your belief.

*Jack W. Fleeman* / ATTORNEY AT LAW  
STATE BAR OF NEVADA CERTIFIED FAMILY LAW SPECIALIST



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**From:** Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)>  
**Sent:** Tuesday, October 6, 2020 9:58 AM  
**To:** Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)>  
**Cc:** Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)>  
**Subject:** Re: Discussion in Anticipation of Settlement Conference.

There was nothing vague about my email. I wanted to know what you realistically believed was still on the table. The only thing from my perspective that warrants any type of discussion is what settling custody looks like.

If you want to keep billing the file, running up the bill, and exhausting things financially for your client, just say so. But let's not waste time if you're not going to operate in good faith towards settlement and proceed with an overly aggressive posture that accomplishes nothing.

So once again, what do you believe is still on the table for discussion?

On Tue, Oct 6, 2020 at 9:42 AM Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)> wrote:

If you don't want to attempt settlement then say that. If you do, and you think some things are settled, then rather than give a vague "for example, there are certain things that are not on the table," why do you give the actual examples of what you think is settled.

Jack W. Fleeman, Esq.  
Certified Family Law Specialist

Pecos Law Group  
702-388-1851

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

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On Oct 6, 2020, at 9:35 AM, Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)> wrote:

The radio silence makes clear that it's not possible to have a good faith discussion of settlement in this case and I'm not sure that I see the point of wasting a judicial settlement conference that could go to someone else that actually wants to resolve her case.

It's not helpful to say that "all issues" are on the table because it means different things depending on who says it and the context of the case. For example, there are certainly things that are not on the table in this case. Instead of posturing with vague assertions, can we get down to a meaningful discussion of this case and settlement?

On Wed, Sep 30, 2020 at 3:23 PM Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)> wrote:

Adam,

Again, we believe all issues are still open for discussion.

Sincerely,

<image001.png>  
<image002.jpg>

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HENDERSON, NEVADA 89074

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**From:** Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)>  
**Sent:** Tuesday, September 29, 2020 3:36 PM  
**To:** Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)>  
**Cc:** Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)>  
**Subject:** Re: Discussion in Anticipation of Settlement Conference.

Hi Alicia,

Can you clarify what all issues are? For example, all of the property from the former martial home has been split and divided between Chalese and I by agreement.

Sent from my iPhone

On Sep 29, 2020, at 1:38 PM, Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)> wrote:

Hello Adam,

We are not aware that anything has been resolved, and all issues are still open for settlement discussion.

Sincerely,

<image001.png>

<image002.jpg>

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**From:** Adam Solinger <[attorneyadamsolinger@gmail.com](mailto:attorneyadamsolinger@gmail.com)>

**Sent:** Monday, September 28, 2020 3:00 PM

**To:** Alicia Exley <[alicia@pecoslawgroup.com](mailto:alicia@pecoslawgroup.com)>; Jack Fleeman <[Jack@pecoslawgroup.com](mailto:Jack@pecoslawgroup.com)>

**Subject:** Discussion in Anticipation of Settlement Conference.

Hello,

In anticipation of a potential settlement conference in this matter, please let me know what is still in dispute for purposes of trial so that we can discuss potential resolutions



Page 1 of 1

Case 1:19-cv-01000-00000

before the conference.

--

Adam M. Solinger