

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

* * *

ADAM MICHAEL SOLINGER,)
)
 Appellant,)
)
 vs.)
)
 CHALESE MARIE SOLINGER,)
)
 Respondent.)
)
 _____)

Case No.: 84832-COA

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**APPELLANT’S APPENDIX
VOLUME 15**

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CERTIFICATE OF SERVICE

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

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

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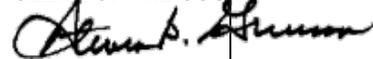
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11/02/2022	Transcript from January 21, 2022 Evidentiary Hearing (Trial Day 2)	19	3994 - 4155
11/02/2022	Transcript from March 1, 2022 Evidentiary Hearing (Trial Day 3)	20	4156 - 4402
11/02/2022	Transcript from March 2, 2022 Evidentiary Hearing (Trial Day 4)	21	4403 - 4669
11/02/2022	Transcript from March 3, 2022 Evidentiary Hearing (Trial Day 5)	22	4670 - 4770
01/25/2022	Transcript from May 10, 2021 Evidentiary Hearing (Trial Day 1)	16	3416 - 3574



1 **EPAP**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
6 Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
7 Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,)
10 Defendant.)

11 **EX PARTE APPLICATION FOR AN ORDER SHORTENING**
12 **TIME ON PLAINTIFF'S EMERGENCY MOTION TO ADDRESS**
13 **DEFENDANT'S INTENT TO WITHHOLD THE MINOR**
14 **CHILDREN**

13 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL
14 SOLINGER, and respectfully moves that, pursuant to EDCR 5.513, the
15 Court shorten time in which to hear Plaintiff's EMERGENCY MOTION
16 TO ADDRESS DEFENDANT'S INTENT TO WITHHOLD THE MINOR
17 CHILDREN.

18 ///

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21

1 **DECLARATION OF ADAM MICHAEL SOLINGER**

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

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

7 2. On July 18, 2021, Adam gave notice to Chalese that he would
8 be taking vacation time with the children on August 5, 2021 at 7 PM
9 through the resumption of his normal custodial time on August 6, 2021.

10 3. Chalese objected to this because it was her daughter's
11 (Cheyenne) birthday. Adam tried to work on an alternative with Chalese
12 but no alternative could be reached. Chalese incorrectly believed that both
13 parties' consent was necessary for vacation. Adam reminded her that was
14 not true under the partial parenting agreement.

15 4. Today, August 4, 2021, Adam messaged Chalese to inquire
16 whether everyone in her household had recovered as there was a virus
17 going around her house that she neglected to tell Adam about when she
18 exchanged custody on August 1, 2021. Michael and Marie subsequently
19 fell ill at 1 AM that night and have since recovered. Adam wanted to know
20 whether everyone had recovered as there would be little point in having
21 two children who were just sick go back to potentially get sick again right

1 before school started when the children would only be there for one night.
2 Adam also reminded Chalese about the vacation time he had noticed back
3 on July 18, 2021.

4 5. Chalese responded to Adam to ask why he would be picking
5 the children up tomorrow, that she did not agree to the vacation time,
6 and that Adam would get the children back on Sunday August 8, 2021.
7 Adam responded to ask what she was talking about because under the
8 normal schedule Chalese would only have the children from Wednesday
9 through Friday of this week. Adam additionally reminded her again of
10 his vacation time and that vacation time does not need to be agreed to
11 under the partial parenting agreement that has been in place for almost
12 2 years in this case.

13 6. Chalese responded by saying “no” and that Adam could “kiss
14 [her] ass and go to hell. You aren’t ruining my daughters first biryhdday.”

15 7. Adam immediately sent an email to Chalese’s counsel to try
16 to resolve the issue without resorting to motion practice. That email was
17 sent at 8:15 am this morning. Adam followed up and reforwarded the
18 email to Chalese’s counsel at 12:03 PM and asked for a response by 3 PM
19 so that a motion can be heard before my vacation time commences.
20 There was no response by 3 PM and Adam forwarded the email at 3:09
21 PM to another attorney at the firm representing Chalese in hopes of

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EXHIBIT A

1 **OST**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,)
Defendant.)

11 **ORDER SHORTENING TIME ON PLAINTIFF'S EMERGENCY**
12 **MOTION TO ADDRESS DEFENDANT'S INTENT TO**
13 **WITHHOLD THE MINOR CHILDREN.**

13 ///

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today, August 5, 2021 at 7:00pm for the planned vacation time.

Copies of this Minute Order to be provided to the parties or their counsel.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: August 12, 2021 10:00 AM Motion

Canceled: August 12, 2021 10:00 AM Opposition & Counter-motion

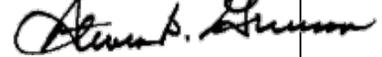
September 17, 2021 9:30 AM Non-Jury Trial
Perry, Mary
Courtroom 23

September 17, 2021 9:30 AM Motion
Perry, Mary
Courtroom 23

September 17, 2021 9:30 AM Opposition & Counter-motion
Perry, Mary
Courtroom 23

PRINT DATE:	08/05/2021	Page 2 of 2	Minutes Date:	August 05, 2021
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.



1 **OPPC**
2 **Jack W. Fleeman, Esq.**
Nevada Bar No. 10584
3 **Alicia S. Exley, Esq.**
4 Nevada Bar No. 14192
5 PECOS LAW GROUP
8925 South Pecos Road, Suite 14A
6 Henderson, Nevada 89074
7 Tel: (702) 388-1851
8 Fax: (702) 388-7406
9 Jack@pecoslawgroup.com
10 Alicia@pecoslawgroup.com
Attorneys for Defendant

11 **DISTRICT COURT**
12 **FAMILY DIVISION**
13 **CLARK COUNTY, NEVADA**

14 **Adam Michael Solinger,**

15 Plaintiff,

16 vs.

17 **Chalese Marie Solinger,**

18 Defendant.
19
20
21

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

Dept No. **P**

Hearing Date: September 9, 2021

Hearing Time: 10:00 a.m.

22 **OPPOSITION TO EMERGENCY MOTION TO ADDRESS DEFENDANT'S INTENT**
23 **TO WITHHOLD THE MINOR CHILDREN AND COUNTERMOTION FOR**
24 **COMPENSATORY TIME, FEES AND SANCTIONS**

25 COMES NOW Defendant Chalese Solinger ("Chalese"), by and through her
26 counsel Jack W. Fleeman, Esq. and Alicia S. Exley, Esq., of PECOS LAW GROUP,
27 and hereby submits her opposition to Plaintiff Adam Solinger's ("Adam")
28

1 *Emergency Motion to Address Defendant's Intent to Withhold the Minor Children,*
2
3 and requests the following relief:

- 4 1. An Order denying Adam's Compensatory time with the minor
5 children;
- 6 2. A termination of the required right of first refusal in this case;
- 7 3. An award of attorney's fees and costs;
- 8 4. Sanctions against Adam; and
- 9 5. For any further relief the court deems just and proper.

10
11
12 This opposition and countermotion is made and based upon all the papers
13 and pleadings on file herein, the attached Points and Authorities, and any other
14 evidence and argument as may be adduced at the hearing of this matter.
15

16
17 Respectfully Submitted by:
18 PECOS LAW GROUP

19 */s/ Jack W. Fleeman*

20 **Jack W. Fleeman, Esq.**
Nevada Bar No. 010584
21 **Alicia S. Exley, Esq.**
Nevada Bar No. 14192
22 8925 S. Pecos Road, Suite 14A
23 Henderson, NV 89074
24 *Attorneys for Defendant*

1 3. At 4:07 p.m. on August 4, 2021, Adam filed his *emergency* motion,
2 asking the court to order Chalese to turn the children over on August 5, 2021 so that
3 he would not lose his noticed “vacation” time.
4

5 4. Adam’s motion contained the EDCR 5.502 notice that Chalese had 14
6 days to respond to his motion with an opposition.
7

8 5. At 4:20 p.m. on August 4, 2021, Adam filed an Ex Parte Application
9 for an Order Shortening Time.
10

11 6. EDCR 5.514(c) states that an order shortening time “must provide a
12 satisfactory explanation why it is necessary to” shorten the time. Adam’s ex parte
13 application for OST stated only that it an OST was necessary because the issue
14 would become moot.
15

16 7. EDCR 5.514(d) states “an order shortening time must be served on all
17 parties upon issuance and at least 1 day before the hearing.”
18

19 8. At 9:30 a.m. on August 5, 2021, less than two business hours after
20 Adam filed his motion, the court issued a minute order directing Chalese to turn the
21 children over to Adam at 7:00 p.m. that same day. The court referenced NRCP 1
22 and EDCR 1.10 for its ability to issue such a decision.
23

24 9. With respect to the court, neither NRCP 1 or EDCR 1.10 permit the
25 court to issue an order without due process. Chalese was to be given 14 days, per
26 rule and notice, to present her opposition to the court. The fact that the issue would
27
28

1 be moot is immaterial. The issue was not even ripe because she had not withheld
2 the children. The court issued the order, while also denying the OST, solely on
3 Adam's representations. Adam also admitted that he had known about Chalese's
4 alleged intent to refuse to turn over the children for several weeks. Adam
5 nevertheless waited weeks to even attempt to address the issue with counsel or the
6 court.
7
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9
10 10. The court then issued a second minute order that included a statement
11 that "as it appears there is not a formal order as to the child's birthday, it remains a
12 valid trial issue."² The second minute order also contained a warning that both
13 attorneys would have an order to show cause issued for sanctions if the order from
14 July 8, 2021, which Adam had been ordered to draft, was not submitted."³
15

16
17 11. In warning counsel of a possible order to show cause on the non-
18 submitted order, the court ordered that "prior to leaving for his vacation, the order
19 needs to be submitted" by Adam. This clearly indicates that the court believed that
20 Adam was leaving for a vacation. Why would the court think that? Clearly it was
21 because Adam filed an *emergency* motion that would have only made sense if he
22 needed an issue addressed so that his vacation was not thwarted.
23
24

25
26 ² This statement reveals a misunderstanding of fact. The birthday was for the children's
27 sibling, Chalese's youngest child, who was turning one year old.

28 ³ Adam did not provide a draft of that order until *after* the second minute order was issued.
The proposed order was then submitted very quickly.

1 **12. The following facts demonstrate that there was no emergency that**
2 **needed to be addressed, that Adam has again deprived the children and Chalese**
3 **of valuable time together, and that Adam had no vacation planned:**
4

5 a) Under the current temporary orders, Chalese was
6 to have August 4th at 7:00 p.m. until August 6th at
7 7:00 p.m. – a total of two days.

8 b) Adam noticed his vacation time for Chalese’s
9 child’s birthday, which is August 5th, which
10 essentially cut her timeshare in half this week,
11 starting on the child’s birthday.

12 c) Chalese immediately told Adam he could not have
13 that day because it was her child’s birthday.

14 d) Adam did not notify counsel or the court of
15 Chalese’s intended refusal until August 4th, which
16 did not provide enough time to work anything out.

17 e) Adam filed his emergency motion indicating that
18 his vacation could not occur if his motion was not
19 granted.

20 f) The court almost immediately issued its minute
21 orders, which included a provision that Adam must
22 submit a past due order “prior to leaving for
23 vacation.”

24 g) Under the vacation provision of the parties’
25 Parenting Agreement, a parent noticing vacation,
26 “prior to leaving for vacation,” is required to
27 provide “dates of travel, destination(s),
28 location(s).” Adam did not provide that
 information to Chalese or the court.

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- h) At 3:34 p.m. on August 5, 2021, undersigned counsel asked Adam to provide his itinerary for his vacation. After more than an hour of Adam ignoring the question, counsel finally threatened a motion for OSC if Adam did not provide it by 5:00 p.m.⁴

- i) Adam’s response to the threatened motion for OSC was not to provide the itinerary. Instead, his response was: “My vacation begins at 7 pm, not 5. You don't need to jump the gun and file an OSC.” He then threatened to file a motion for OSC of his own regarding Chalese allegedly not abiding by the right of first refusal.⁵

- j) ***At 7:02 p.m., time having run out, Adam finally responded with simply, “There’s is no itinerary.” In other words, Adam had no vacation planned. He simply wanted to mess with her on her child’s birthday and poach her last day with the kids before school starts next week.***⁶

⁴ Throughout the afternoon, Adam continued to converse with counsel regarding the language of the past due order, but refused to answer the itinerary question. Counsel, in each email, continued to ask for it.

⁵ This is Adam’s M.O. He recently filed a Rule 11 motion for sanctions after counsel filed a motion for sanctions against him. Adam is all about tit-for-tat and punishing Chalese. He is never about the children’s best interests in this case. Counsel is still gathering the facts on this issue. At this time, it appears Adam was again playing games and trying to use orders as weapons against Chalese. The end result of this may be to ask that the right of first refusal, which has been nothing but a problem, be terminated.

⁶ The fact that Adam knew he had no vacation planned, and thus no itinerary, but chose to ignore the question for hours, and then delay even further with an excuse that he had until 7:00 p.m., reeks of bad faith. But it is completely unsurprising at this point.

1 13. Adam has now successfully deprived Chalese of her last day of summer
2 with the children, and he has caused her significant stress on her child's birthday.
3 This of course was undoubtedly Adam's goal.

4
5 14. Chalese should receive compensatory time under NRS 125C.020.
6 Adam wrongfully deprived her of valuable time that she and the children cannot get
7 back. He also interfered with the children being able to spend time with their sibling
8 on a special day.

9
10
11 15. The compensatory time should be awarded immediately. Adam has
12 never had any repercussions for his misbehaviors. So, while there is already
13 compensatory time as an issue at trial because of Adam's previous misconduct,
14 failing to address this issue now will simply result in more bad faith conduct.

15
16
17 16. Adam should also be sanctioned under EDCR 7.60(b). He filed an
18 emergency motion without any emergency. He led this court to believe that he
19 would not be able to take a vacation when there was no vacation even planned. He
20 did all of this for one purpose – to hurt Chalese. All of this misconduct has
21 needlessly increased the proceedings and litigation in this case. Adam should be
22 sanctioned \$5,000 immediately. To not do so will simply result in his continued
23 efforts to wrongfully interfere with the children's relationship with their mother.

24
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27 . . .

28 . . .

1 17. Chalese should be awarded her reasonable fees and costs. She should
2 prevail on these issues, and her fees have been needlessly increased by Adam's
3
4 misrepresentations regarding vacation.

5 Respectfully Submitted by:
6 PECOS LAW GROUP

7 /s/ Jack W. Fleeman

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

9 Nevada Bar No. 010584

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

11 Nevada Bar No. 14192

12 8925 S. Pecos Road, Suite 14A

13 Henderson, NV 89074

14 *Attorneys for Defendant*

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DECLARATION OF COUNSEL

I am counsel for the Defendant in the above-referenced matter and can state that the facts in the foregoing opposition and countermotion are true and correct to the best of my knowledge, unless they are stated upon information and belief, and in that case, I believe them to be true.

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

DATED this 5th day of August, 2021.

/s/ Jack W. Fleeman
JACK W. FLEEMAN, ESQ.

From: curlyfriez09@yahoo.com <curlyfriez09@yahoo.com>
Sent: Thursday, August 5, 2021 10:21 PM
To: Jack Fleeman <Jack@pecoslawgroup.com>
Cc: Angela Romero <angela@pecoslawgroup.com>; Alicia Exley <alicia@pecoslawgroup.com>
Subject: Re: Solinger v. Solinger - DRAFT OPPOSITION (PLEASE REVIEW AND RESPOND)

I approve.

-Chalese Solinger

On Aug 5, 2021, at 8:51 PM, Jack Fleeman <Jack@pecoslawgroup.com> wrote:

Chalese,

Please review the attached draft opposition and let me know if any facts need to be changed or added. Once you approve, I will file.

Jack W. Fleeman || Attorney at Law
STATE BAR OF NEVADA CERTIFIED FAMILY LAW SPECIALIST
<image002.png>
8925 S. Pecos Road, Suite 14A
Henderson, Nevada 89074
P: (702) 388-1851
F: (702) 388-7406
E: JACK@PECOSLAWGROUP.COM

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CERTIFICATE OF SERVICE

Pursuant to NRCF 5(b), I hereby certify that Defendant’s “OPPOSITION TO EMERGENCY MOTION TO ADDRESS DEFENDANT’S INTENT TO WITHHOLD THE MINOR CHILDREN AND COUNTERMOTION FOR COMPENSATORY TIME, FEES AND SANCTIONS” 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	attorneyadamsolinger@gmail.com
Vince Mayo, Esq.	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 6th day of August, 2021.

/s/ Angela Romero
Angela Romero
 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. P

**MOTION/OPOSITION
FEE INFORMATION SHEET**

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

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

\$25 The Motion/Oposition being filed with this form is subject to the \$25 reopen fee.
-OR-
 \$0 The Motion/Oposition being filed with this form is not subject to the \$25 reopen fee because:
 The Motion/Oposition is being filed before a Divorce/Custody Decree has been entered.
 The Motion/Oposition is being filed solely to adjust the amount of child support established in a final order.
 The Motion/Oposition 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/Oposition being filed with this form is not subject to the \$129 or the \$57 fee because:
 The Motion/Oposition is being filed in a case that was not initiated by joint petition.
 The party filing the Motion/Oposition 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/Oposition 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/Oposition: Defendant Date 08/06/2021

Signature of Party or Preparer /s/ Angela Romero



1 **ERR**

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

12 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.

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

23 Dept No. **P**

24 Hearing Date: September 9, 2021

25 Hearing Time: 10:00 a.m.

26 **ERRATA TO DEFENDANT'S OPPOSITION TO EMERGENCY MOTION TO**
ADDRESS DEFENDANT'S INTENT TO WITHHOLD THE MINOR CHILDREN
AND COUNTERMOTION FOR COMPENSATORY TIME, FEES AND SANCTIONS

COMES NOW Defendant Chalese Solinger ("Chalese"), by and through her counsel Jack W. Fleeman, Esq. and Alicia S. Exley, Esq., of PECOS LAW GROUP and respectfully submits her *Errata to Defendant's Opposition to Emergency Motion to Address Defendant's Intent to Withhold the Minor Children and Countermotion for Compensatory Time, Fees and Sanctions*.

1 Defendant's aforementioned Opposition and Counter-motion filed herein on
2 August 6, 2021 contained an error, wherein Defendant's claim for relief
3 inadvertently stated "An Order denying Adam's Compensatory time with the
4 minor children." The corrected claims for relief are as follows:
5

- 6 1. **An Order awarding Chalese compensatory time with the minor**
7 **children;**
- 8 2. A termination of the required right of first refusal in this case;
- 9 3. An award of attorney's fees and costs;
- 10 4. Sanctions against Adam; and
- 11 5. For any further relief the court deems just and proper.

12 DATED this 6th day of August 2021.

13
14 Respectfully Submitted by:

15 PECOS LAW GROUP

16 /s/ Jack W. Fleeman

17 **Jack W. Fleeman, Esq.**

18 Nevada Bar No. 010584

Alicia S. Exley, Esq.

19 Nevada Bar No. 14192

8925 S. Pecos Road, Suite 14A

20 Henderson, NV 89074

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 6th day of August 2021, I served a copy of the ERRATA TO DEFENDANT’S OPPOSITION TO EMERGENCY MOTION TO ADDRESS DEFENDANT’S INTENT TO WITHHOLD THE MINOR CHILDREN AND COUNTERMOTION FOR COMPENSATORY TIME, FEES AND SANCTIONS 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

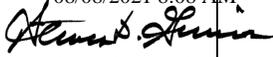
Pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system: and/or

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:

- | | |
|------------------|--------------------------------|
| Adam M. Solinger | attorneyadamsolinger@gmail.com |
| Vince Mayo, Esq. | vmgroup@theabramslawfirm.com |
| admin email | email@pecoslawgroup.com |
| Alicia Exley | alicia@pecoslawgroup.com |
| Jack Fleeman | jack@pecoslawgroup.com |
| Angela Romero | angela@pecoslawgroup.com |

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

Electronically Filed
08/08/2021 8:08 AM

CLERK OF THE COURT

1 **ORDR**
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

5
6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,) Date of Hearing: July 8, 2021
Time of Hearing: 11:00 a.m.
10 Defendant.)

11 **ORDER FROM JULY 8, 2021 HEARING**

12 THIS MATTER came on for a hearing before this Court on the 8th
13 day of July, 2021, Plaintiff, **Adam Michael Solinger** (“Adam”),
14 present; and Defendant, **Chalese Marie Solinger** (“Chalese”) present
15 and represented by and through her attorney, **Jack W. Fleeman,**
16 **Esq.**, of Pecos Law Group; and the Court being fully advised in the
17 premises and good cause appearing makes the following findings and
18 orders:

19 THE COURT FINDS that in the interest of public safety due to the
20 Coronavirus pandemic, all parties were present via VIDEO
21 CONFERENCE through the Bluejeans application.

1 THE COURT STATED the reason the order shortening time was
2 granted was because the two expert witnesses in this case both expressed
3 concerns regarding Chalese's ability to follow orders and the Court is
4 concerned that Chalese has chosen to use Marijuana against the Court's
5 order.

6 THE COURT FINDS that it can be assumed based upon the
7 Marijuana usage that Chalese is not putting her children first.

8 THE COURT NOTES that the drug test did not include testing for
9 Marijuana through Chalese's hair and Marijuana was only tested for via
10 urinalysis.

11 THE COURT ORDERS that it rescinds its previous order awarding
12 joint physical custody until school resumes and instead reverts to the
13 previous temporary primary physical custody order ordered by Judge
14 Moss in June of 2019.

15 THE COURT ORDERS that Adam shall have temporary primary
16 physical custody of Michael and Marie.

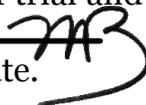
17 THE COURT ORDERS that for the summer, before the children
18 return to school, the exchange time is changed from 6:00 PM to 7:00
19 PM for that period of time only. ^{due to the Defendant's work schedule.} 

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1 THE COURT FURTHER ORDERS that exchanges are to take place
2 at the VA Hospital located along the 215 in the manner consistent with
3 how the parties have been exercising custodial exchanges.

4 THE COURT FURTHER ORDERS that due to Chalese's work
5 schedule, Chalese's FaceTime with the children is changed to 8:00 AM.

6 THE COURT ADMONISHES the parties that they shall clearly
7 answer questions asked by opposing counsel at the time of trial and that
8 evasive answers will be looked at by the Court with disrepute. 

9 THE COURT ADMONISHES Chalese ~~that~~ the Court wants to hear
10 from the Defendant's expert witness why if she's not putting the children
11 ~~first~~ the Defendant should have joint physical custody of the children. 

12 THE COURT ORDERS that all other issues shall be DEFERRED
13 until Trial.

14 IT IS FINALLY ORDERED that Mr. Solinger shall prepare the
15 order with Mr. Fleeman having seven days to review and approve as to
16 form and content.

17 DATED this _____ day of _____, 20_____.

Dated this 8th day of August, 2021


DISTRICT COURT JUDGE

418 DAB 3E57 6C41
Mary Perry
District Court Judge

1 Respectfully Submitted,

2

3 /s/ Adam M. Solinger
Adam M. Solinger
Plaintiff

4

5 As to form and content:
PECOS LAW GROUP

6

7 /s/ Jack W. Fleeman
Jack W. Fleeman, Esq.
Nevada Bar No. 010584
8925 South Pecos Road, Suite 14A
Henderson, Nevada 89074
Attorney for Defendant

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

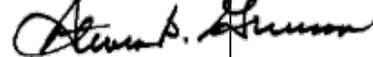
Adam Michael Solinger, Plaintiff	CASE NO: D-19-582245-D
vs.	DEPT. NO. Department P
Chalese Marie Solinger, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 8/8/2021

- | | |
|-----------------|--------------------------------|
| Vincent Mayo | VMGroup@TheAbramsLawFirm.com |
| Jack Fleeman | jack@pecoslawgroup.com |
| Angela Romero | angela@pecoslawgroup.com |
| admin email | email@pecoslawgroup.com |
| Alicia Exley | alicia@pecoslawgroup.com |
| Adam Solinger | attorneyadamsolinger@gmail.com |
| Adam Solinger | adam@702defense.com |
| Louis Schneider | lcsllawllc@gmail.com |



1 **RPLY**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
6 Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
7 Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,)
10 Defendant.)

11 **REPLY IN SUPPORT OF EMERGENCY MOTION TO ADDRESS**
12 **DEFENDANT’S INTENT TO WITHHOLD THE MINOR**
13 **CHILDREN**

14 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL
15 SOLINGER, and hereby submits his reply in support of the above
16 captioned motion.

17 This reply is made and based upon the attached Points and
18 Authorities, the Declaration of Plaintiff attached hereto, and all papers
19 and pleadings on file herein.

20 Dated Monday, August 23, 2021.

21 Respectfully Submitted,

/s/ Adam M. Solinger

Adam M. Solinger

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **INTRODUCTION**

3 This brief reply will focus on only what is necessary for purposes of
4 supporting the previously filed motion. This reply will not respond to
5 everything filed within the Defense opposition, but only what is relevant
6 for purposes of fleshing out the original motion.

7 If there is no other take away from this reply brief, then the
8 following is critical to exploring the original issue brought up by the
9 motion. First, Chalese was not “deprived” of her last day of summer with
10 the children. Indeed, Chalese was working that day and would not have
11 had the children anyway. Adam would have had the children regardless
12 or Chalese would have had them with a babysitter while depriving Adam
13 of the opportunity to be with them. Second, Adam took vacation on that
14 day specifically because the children had a back to school event to meet
15 their new teachers and receiving school information for the upcoming
16 school year. Chalese did not attend this event and the children would not
17 have been at the event either, but for Adam taking the vacation time he
18 did to ensure their attendance.

19 **I. STATEMENT OF FACTS**

20 Of note, after the original motion was filed on August 4, 2021,
21 Chalese picked up the kids for the portion of her custodial timeshare

1 slightly after 7 PM. Upon picking up the kids, Adam updated Chalese that
2 the children had eaten dinner but would need baths and to have their
3 teeth brush, among other things.

4 Chalese's response to that portion of the message was to say, "Can
5 you meet me in the morning so I can go to work?"¹ Without going into the
6 back and forth, Adam offered to pick the children up early at 7:00 AM,
7 because he had a root canal scheduled for 8 AM, or that Chalese could
8 drop the Children off at his house if he was still at the dentist and Jessica
9 would watch the children until he got home. Chalese refused this and
10 instead insisted that she would make other child care arrangements while
11 disregarding right of first refusal.² This is mentioned and relevant
12 because Chalese was also working the next day, August 6, 2021. Chalese
13 and Counsel claim that Adam successfully deprived Chalese of her last
14 day of summer with the children. However, this could not be further from

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17 ¹ This is in reference to Adam picking up and Watching the children on Thursday August 5, 2021 so
that Chalese could work.

18 ² It's a really curious to ask that the Court terminate right of first refusal in this case. The nonsense
19 argument by Counsel appears to be that because his client cannot follow right of first refusal, it should
20 be terminated. That's a very strange argument to make when Chalese cannot and will not follow
21 Court orders. Perhaps the request is intended to eliminate yet another order that Chalese will not
follow.

1 the truth because Chalese was working that day, August 6, 2021,
2 regardless. So, Adam did not deprive Chalese of anything.

3 Additionally, Chalese completely fails to inform the Court that the
4 children had a scheduled back to school/meet the teacher event at their
5 school on August 6, 2021.

6 **II. LAW AND ARGUMENT**

7 Chalese's opposition and counter motion should be struck in their
8 entirety as moot and unwarranted. The issue was already handled via this
9 Court's minute order and the remaining questions the motion raised
10 were set to be answered at the continued trial on September 17, 2021.
11 Instead of actually adding to the record before the Court, Chalese
12 attempts to distort, misstate, and mislead the Court. Chalese presents a
13 picture to this Court of an upset and besieged mother that desperately
14 wanted all of her children present for her youngest child's birthday. The
15 truth is far more shocking: Chalese simply wanted to deprive Adam of
16 time with the children while she worked and had the children with a
17 babysitter or she wanted to play a game and notify Adam at the last
18 minute that he would need to pick up the children to watch them while
19 she worked.³ Not only does this hurt the children, by any measure, it also

20 ³ Chalese's pattern and practice is to wait until the night before she would need Adam to watch the
21 children while she works in hopes of catching him unable to do so.

1 does not account for the fact that the children could have potentially
2 missed their opportunity to meet their teachers and see their new
3 classrooms had Chalese kept the children with a babysitter instead of
4 Adam as she literally did the day before on August 5, 2021.

5 The request for sanctions should likewise be denied. The pattern
6 and practice of this case has been that vacation time is not limited to
7 vacations in the traditional sense of the term. The parties have liberally
8 used the time when they have things occurring in town and want
9 additional time for that purpose. For example, the very first motion
10 before this Court involved a request to modify the custody schedule based
11 upon Chalese's refusal to take Michael to his in-person instruction for the
12 Spring 2021 semester. As part of the factual basis for that request, Adam
13 had to take vacation time with the kids to ensure that Michael attended
14 his first two days of in-person instruction. Additionally, Adam had to take
15 vacation time with the children in order to take Michael to his pre-k
16 graduation as Chalese refused to take him. Frankly, Adam would love to
17 use his vacation time to actually vacation with the children. But, Adam is
18 increasingly having to use the time to make sure the children either go to
19 school or attend educational necessities.

20 Additionally, Counsel has a solemn obligation to this Court to
21 conduct a reasonable inquiry under the circumstances of his factual

1 representations to the Court. *See* NRCP 11. It's unclear what investigation
2 Counsel did, but given the explicit mention about Adam raising concerns
3 regarding right of first refusal directly to Counsel, Counsel should have
4 asked Chalese what her plans were with the children on August 6, 2021
5 – the day Counsel alleges that Adam deprived Chalese of. Perhaps, had
6 he asked her what her plans were that day, he would have learned that
7 Chalese was working, that she had been scheduled to work that day all
8 long, and that there was no time that Chalese was deprived of because
9 Adam would and/or should have been watching the children anyway
10 while Chalese was at work.

11 This duty to investigate is all the more important in this case
12 because Chalese has a chronic history of using her attorney to lie to the
13 Court. For example, Chalese's very first filing in this case was a motion
14 that, among other things, accused Adam of abandoning her and the
15 children for 3 days and absconding without any notice or
16 communication. *See* Motion to Set Aside filed February 7, 2019 at 3:16-
17 17. Adam filed his opposition and attached proof that not only had he
18 been in contact with Chalese and had been asking about the children, but
19 that his leaving was planned for attending his grandfather's funeral after
20 his grandfather had taken his own life. Chalese, in a stunning show of
21 brazen audacity that would leave most people speech less, had the nerve

1 to reply and admit that she had spoken with Adam, but that while
2 speaking to him Adam threatened to drive off of the road into the ocean
3 and kill himself. *See Reply filed 3/18/2019 at 3:3-5.*

4 If that were not enough, Bruce Shapiro was formally lead counsel
5 on this case and Chalese used him to lie to Judge Moss about the fact that
6 her and Josh had permanently broken up after Josh tried to break into
7 the vehicle Adam was in during a custody exchange to assault Adam. That
8 very same night after making those representations, Josh stayed the
9 night with Chalese despite his parents living less than a mile away. The
10 entirety of Pecos Law Group then withdrew from representing Chalese
11 due to an alleged breakdown in the attorney client relationship, among
12 other things. Inexplicably, Chalese was then represented by Vegas West
13 Attorneys, which upon information and belief is owned in whole or in
14 part by members of the Pecos Law Group. Ultimately, as the Court is well
15 aware, Pecos is back to representing Chalese. All of this history goes to
16 show that current lead counsel is well aware of Chalese's disdain for
17 honesty and candor to the Court and should have conducted some type
18 of investigation before making the ridiculous claims that were made in
19 opposition.

20 Not to mention, the request for a \$5,000 monetary sanction is
21 patently absurd. It's a figure pulled out of thin air for shock value and

1 possibly intended to pay for the waste of time and money Counsel spent
2 filing a deceptive, unnecessary, and unresearched opposition that
3 survives no purpose other than to pad Counsel's billable hours.

4 **III. CONCLUSION**

5 This motion is already set to be heard in more detail when trial
6 resumes. In the meantime, Chalese should have to answer to the Court
7 regarding her violation of right of first refusal, why she, or her Counsel,
8 believes that her inability to follow said right is a good reason to
9 terminate the same, and what investigation Counsel did before filing the
10 opposition that offers such an incorrect statement of facts.

11 Dated Monday, August 23, 2021.

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Respectfully Submitted:

/s/ Adam M. Solinger
Adam M. Solinger

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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 *REPLY IN SUPPORT OF EMERGENCY MOTION TO ADDRESS DEFENDANT'S INTENT TO WITHHOLD THE MINOR CHILDREN*

3. I have read said *Reply* 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 Monday, August 23, 2021.

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

WITHHOLD THE MINOR CHILDREN AND COUNTERMOTION FOR COMPENSATORY TIME, FEES AND SANCTIONS was filed the next day, August 6, 2021. A Motion Hearing was put on Calendar by the Clerk s Office for September 9, 2021 at 10:00am.

However, once again, the Parties had come before the Court on July 8, 2021 on a different Motion and Opposition. At that Hearing, the Court Ordered that all other issues shall be Deferred until trial since the Parties have the second day of their Evidentiary Hearing set for September 17, 2021 at 9:30am.

Therefore, the Court is hereby also DEFERRING any further determinations on either Plaintiff s EMERGENCY MOTION TO ADDRESS DEFENDANTS INTENT TO WITHHOLD THE MINOR CHILDREN or Defendant s OPPOSITION TO EMERGENCY MOTION TO ADDRESS DEFENDANTS INTENT TO WITHHOLD THE MINOR CHILDREN AND COUNTERMOTION FOR COMPENSATORY TIME, FEES AND SANCTIONS and Plaintiff s Subsequent Reply to the time of trial.

The September 9, 2021 10:00 am Motion Hearing is hereby Continued to be heard at the time of trial on September 17, 2021 at 9:30am. .

OFF CALENDAR

Copies of this Minute Order to be provided to the parties or their counsel.

INTERIM CONDITIONS:

FUTURE HEARINGS:

Canceled: September 09, 2021 10:00 AM Motion

Canceled: September 09, 2021 10:00 AM Opposition & Counter-motion

September 17, 2021 9:30 AM Non-Jury Trial
Perry, Mary
Courtroom 23

September 17, 2021 9:30 AM Motion
Perry, Mary
Courtroom 23

September 17, 2021 9:30 AM Opposition & Counter-motion
Perry, Mary
Courtroom 23

PRINT DATE:	08/26/2021	Page 2 of 3	Minutes Date:	August 26, 2021
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Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

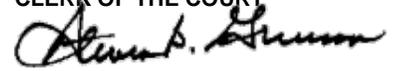
September 17, 2021 9:30 AM Motion
Perry, Mary
Courtroom 23

September 17, 2021 9:30 AM Opposition & Countermotion
Perry, Mary
Courtroom 23

PRINT DATE:	08/26/2021	Page 3 of 3	Minutes Date:	August 26, 2021
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FDF
Jack W. Fleeman, Esq.
 Nevada Bar No. 10584
Jack@pecoslawgroup.com
 PECOS LAW GROUP
 8925 S. Pecos Rd., Suite 14A
 Henderson, NV 89074
 Telephone: (702) 388-1851
 Attorney for Defendant

Electronically Filed
 9/1/2021 1:48 PM
 Steven D. Grierson
 CLERK OF THE COURT



EIGHTH JUDICIAL DISTRICT COURT
 FAMILY DIVISION
 CLARK COUNTY, NEVADA

<p>Adam Michael Solinger Plaintiff,</p> <p>vs.</p> <p>Chalese Marie Solinger Defendant.</p>	<p>Case No. D-19-582245-D</p> <p>Dept. No. P</p>
---	--

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (*first, middle, last*) Chalese Marie Solinger
2. How old are you? 30
3. What is your date of birth? 11/17/1990
4. What is your highest level of education? High School, cosmetology school

B. Employment Information:

1. Are you currently employed/self-employed? (check one)

No

Yes

If yes, complete the table below. Attach an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
06/2021	Cookie Cutters	stylist	Monday - Friday	10:00 a.m. - 6:00 p.m.

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: Cookie Cutters Date of Hire: May 2019 Date of Termination: June 26, 2020

Reason for Leaving: Bedrest due to pregnancy

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 07/31/2021 my gross year to date pay is \$3,813.10.

B. Determine your Gross Monthly Income.

Hourly Wage

\$ 11.03										
Hourly Wage	X	40	=	\$ 441.20	X	52	÷	\$ 22,942.40	=	\$ 1,911.87
		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Gross Monthly Income

Annual Salary

Annual Income	÷	12 Months	=	Gross Monthly				

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:	Weekly	\$ 279.07	\$ 1,209.30
Net Rental Income:			
Overtime Pay:			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support:	Monthly	\$ 500.00	\$ 500.00
Child Support:			
Workman's Compensation:			
Other: Cash Tips (not on paycheck)*	Weekly	\$ 100.00	\$ 433.33
Total Average Other Income Received			\$ 2,142.63

** Estimated; Cash Tips Vary*

Total Average Gross Monthly Income (add totals from B and C above)	\$ 4,054.50
--	-------------

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	
2.	Federal Health Savings Plan	
3.	Federal Income Tax	
4.	Health Insurance	Amount for you: For Opposing Party: For your Child(ren):
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	\$ 44.06
7.	Retirement, Pension, IRA, or 401(k)	
8.	Savings	
9.	Social Security	\$ 188.36
10.	Union Dues	
11.	Other: (Type of Deduction)	
Total Monthly Deductions (Lines 1-11)		\$ 232.42

Business/Self-Employment Income & Expense Schedule

A. Business Income:

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

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

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising			
Car and truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional			
Mortgage or Rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est. tax payments)			
Utilities			
Other:			
Total Average Business Expenses			0

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	\$ 130.00			
Child Support (not deducted from pay)				
Clothing, Shoes, Etc...				
Credit Card Payments (minimum due)	\$ 108.00			
Dry Cleaning				
Electric	\$ 130.00			
Food (groceries & restaurants)	\$ 200.00			
Fuel	\$ 100.00			
Gas (for home)	\$ 80.00			
Health Insurance (not deducted from pay)				
HOA				
Home Insurance (if not included in mortgage)				
Home Phone				
Internet/Cable	\$ 75.00			
Lawn Care				
Membership Fees				
Mortgage/Rent/Lease	\$ 1,185.00			
Pest Control				
Pets	\$ 75.00			
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer				
Student Loans				
Unreimbursed Medical Expense				
Water	\$ 40.00			
Other:				
Total Monthly Expenses	\$ 2,123.00			

Household Information

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

	Child's Name	Child's DOB	With whom is this child living?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1st	Michael Solinger	6/16/2015	Both	Yes	No
2nd	Marie Solinger	8/28/2017	Both	Yes	No
3rd	Cheyenne Lloyd	8/5/2020	Both	No	No
4th					

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

Type of Expense	1st Child	2nd Child	3rd Child	4th Child
Cellular Phone				
Child Care				
Clothing	80	80	100	
Education				
Entertainment				
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation				
Unreimbursed Medical Expenses				
Vehicle				
Other:				
Total Monthly Expenses	80	80	100	0

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

Name	Age	Person's Relationship to You (i.e., sister, friend, cousin, etc...)	Monthly Contribution
Joshua Lloyd	29		

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.	House	\$245,000.00	-	\$216,000.00	=	\$29,000.00	Me
2.	Charles Schwab #8846	Varies	-		=	Varies	Me
3.	America First #024-1	Varies	-		=	Varies	Me
4.	Bank of America #9724	Unknown	-		=	Unknown	Adam
5.	Remaining home sale proceeds	Unknown	-		=	Unknown	Both
6.	2017 Moto Guzzi Café Racer	\$10,000.00	-		=	\$10,000.00	Adam
7.	Forest River Travel Trailer	\$1,200.00	-		=	\$1,200.00	Both
8.	Art collection	Unknown	-		=	Unknown	Both
9.	Firearms	Unknown	-		=	Unknown	Both
10.	Roth 401(k)	Unknown	-		=	Unknown	Adam
11.			-		=	\$0.00	
12.			-		=	\$0.00	
13.			-		=	\$0.00	
14.			-		=	\$0.00	
15.			-		=	\$0.00	
	Total Value of Assets (add lines 1-15)	\$256,200.00	-	\$216,000.00	=	\$40,200.00	

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

Line	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	CapitalOne Venture card	\$4,375.00	Me
2.	CapitalOne Cashback card	\$0.00	Me
3.	Loan from Catrina Bolick for fees	\$80,000.00	Me
4.			
5.			
6.			
	Total Unsecured Debt (add lines 1-6)	\$84,375.00	

Certification

Attorney Information: Complete the following sentence:

1. I (*have/have not*) Have retained an attorney for this case.
2. As of the date of today, the attorney has been paid a total of \$ approx. 190,650.00 on my behalf.
3. I have a credit with my attorney in the amount of \$ 0.00.
4. I currently owe my attorney a total of \$ 0.00.
5. I owe my prior attorney a total of \$ _____.

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

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

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

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

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

/s/ Chalese Solinger
Signature

September 1, 2021
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 September 1, 2021, service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

Via 1st Class U.S. Mail, postage fully prepaid addressed as follows:

Via Electronic Service, in accordance with the Master Service List, pursuant to NEFCR 9, to:

attorneyadamsolinger@gmail.com;
vmgroup@theabramslawfirm.com

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

Executed on September 1, 2021

/s/ Alicia S. Exley, Esq.

An Employee of Pecos Law Group

From: curlyfriez09@gmail.com <curlyfriez09@gmail.com>
Sent: Wednesday, September 1, 2021 11:40 AM
To: Alicia Exley <alicia@pecoslawgroup.com>
Cc: Jack Fleeman <Jack@pecoslawgroup.com>; Angela Romero <angela@pecoslawgroup.com>
Subject: Re: Solinger Matter

I give you permission to electronically sign for me

-Chalese Solinger

Chalene Solinger
 4657 Curbsen Way
 Las Vegas, NV 89110

Direct Deposit

Employee Pay Stub

Check number: DD2162

Pay Period: 07/14/2021 - 07/17/2021

Pay Date: 07/21/2021

Employee

Chalene Solinger, 4657 Curbsen Way, Las Vegas, NV 89110

Earnings and Returs	Qty	Rate	Current	YTD Amount
Hourly SR	34.57	11.03	384.56	1,489.97
Reported Cash Tips			294.00	820.55
Retro Pay				1.90
	34.57		608.56	2,318.42
Taxes			Current	YTD Amount
Medicare Employee A/R Tax			0.00	0.00
Federal Withholding			0.00	0.00
Social Security Employee			-37.73	-143.74
Medicare Employee			-8.83	-33.83
			-46.56	-177.56
Net Pay			562.02	1,141.86

Direct Deposit	Amount
Checking: *****2843	562.02
Memo	
Direct Deposit	

Chales Solinger
 4657 Curdsen Way
 Las Vegas, NV 89110

Direct Deposit

Employee Pay Stub Check number: DD2177 Pay Period: 07/16/2021 - 07/24/2021 Pay Date: 07/28/2021

Employee
 Chales Solinger, 4657 Curdsen Way, Las Vegas, NV 89110

Earnings and Hours	Qty	Rate	Current	YTD Amount
Hourly SR	38.37	11.03	423.97	1,932.84
Reported Cash Tip			534.50	1,148.00
Retro Pay				1.50
	38.37		791.47	3,079.89

Taxes	Current	YTD Amount
Medicare Employee Adol Tax	0.00	0.00
Federal Withholding	0.00	0.00
Social Security Employee	-47.21	-190.36
Medicare Employee	-11.03	-44.88
	-58.25	-235.61

Net Pay	703.22	2,844.28
----------------	---------------	-----------------

Direct Deposit	Amount
Checking *****0241	703.22

Memo
 Direct Deposit

Chalse Solinger
 4657 Cuddlen Way
 Las Vegas, NV 89110

Direct Deposit

Employee Pay Stub

CHECK number: 002192

Pay Period: 07/25/2021 - 07/31/2021

Pay Date: 08/04/2021

Employee

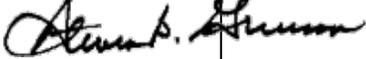
Chalse Solinger, 4657 Cuddlen Way, Las Vegas, NV 89110

Earnings and Hours	Qty	Rate	Current	YTD Amount
Hourly SR	40.18	11.03	448.61	2,377.45
Reported Cash Tip			286.70	1,433.75
Refr Pay				1.80
	40.18		735.31	3,813.10
Taxes			Current	YTD Amount
Medicare Employee Add Tax			0.00	0.00
Federal Withholding			0.00	0.00
Social Security Employee			-48.46	-236.41
Medicare Employee			-10.63	-55.29
			68.09	-201.70
Net Pay			677.12	3,621.40

Direct Deposit	Amount
Checking *****0261	677.12

Memo

Direct Deposit



1 **ASSC**
2 CHARLES R. GOODWIN, ESQ
3 Nevada Bar No. 14879
4 GOODWIN LAW GROUP, PLLC
5 3100 W. Charleston Blvd
6 Las Vegas, NV 89102
7 (702) 472-9594
8 charles@goodwinlawgroup.net

7 **EIGHTH JUDICIAL DISTRICT COURT**
8 **FAMILY DIVISION**
9 **CLARK COUNTY, NEVADA**

10 ADAM M. SOLINGER,)
11)
12 Plaintiff,)
13 vs.)
14 CHALESE M. SOLINGER,)
15)
16 Defendant.)
17)

CASE No.: D-19-582245-D
DEPT NO: P

15 **NOTICE OF ASSOCIATION OF COUNSEL**

16 **Summary**

17 **PLEASE TAKE NOTICE** that Charles R. Goodwin, Esq. hereby associates with Adam M.
18 Solinger, Esq. as co-counsel for plaintiff in this matter. The name, office, address, telephone
19 number, and email address of the associated counsel are as follows:

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Charles R Goodwin
Goodwin Law Group, PLLC
3100 W Charleston Blvd
Las Vegas, NV 89102
Telephone: (702) 472-9594
charles@goodwinlawgroup.net

DATED this 10th day of September 2021.

GOODWIN LAW GROUP, PLLC

BY: Charles Goodwin
CHARLES R. GOODWIN, ESQ
Nevada Bar No. 14879
3100 W. Charleston Blvd
Las Vegas, NV 89102
(702) 472-9594
charles@goodwinlawgroup.net

CERTIFICATE OF SERVICE

I hereby certify that service of the above and foregoing was made this 16th day of September upon the appropriate parties hereto by facsimile or electronic transmission to:

CLARK COUNTY DISTRICT ATTORNEY’S OFFICE C/O
motions@clarkcountyda.com

Adam M. Solinger attorneyadamsolinger@gmail.com

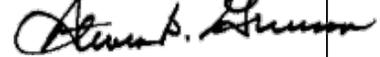
admin email email@pecoslawgroup.com

Alicia Exley alicia@pecoslawgroup.com

Jack Fleeman jack@pecoslawgroup.com

Angela Romero angela@pecoslawgroup.com

/s/Charles R Goodwin
An employee of Goodwin Law Group, PLLC



1 **MOT**
2 **Jack W. Fleeman, Esq.**
Nevada Bar No. 10584
3 **Alicia S. Exley, Esq.**
Nevada Bar No. 14192
4 PECOS LAW GROUP
5 8925 South Pecos Road, Suite 14A
Henderson, Nevada 89074
6 Tel: (702) 388-1851
Fax: (702) 388-7406
7 Jack@pecoslawgroup.com
8 Alicia@pecoslawgroup.com
Attorneys for Defendant

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

11 **Adam Michael Solinger,**

12 Plaintiff,

13 vs.

14 **Chalese Marie Solinger,**

15 Defendant.

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

Dept No. **P**

16 **NO ORAL ARGUMENT**
17 **REQUESTED**

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

22 **EMERGENCY MOTION FOR IMMEDIATE WITHDRAWAL OF ATTORNEY**

23 **COMES NOW** Jack W. Fleeman, Esq. and PECOS LAW GROUP, attorneys
24 for defendant, and move this court for an order granting their immediate
25 withdrawal from this case.
26

1 Defendant's Motion is made and based upon the declaration of counsel
2 below, the attached Points and Authorities, and any other evidence and argument
3 as may be adduced at the hearing of this matter.
4

5 DATED this 21st day of September 2021.

6 PECOS LAW GROUP

7
8 /s/ Jack W. Fleeman

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

15 *Attorneys for Defendant*
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POINTS AND AUTHORITIES

I. LEGAL AUTHORITIES

EDCR 7.40 states:

Rule 7.40. Appearances; substitutions; withdrawal or change of attorney.

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

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

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

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

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

(ii) If the application is made by the client, the client must state in the application the address at which the client may be served with notice of all further proceedings in the case in the event the application is granted, and the telephone number, or last known telephone number, at which the client may be reached

1 and must serve a copy of the application upon the
2 client's attorney and all other parties to the action or
3 their attorneys.

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

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

8 Rule 1.16. Declining or Terminating Representation.

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

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

15 (2) The lawyer's physical or mental condition
16 materially impairs the lawyer's ability to represent the
17 client; or

18 (3) The lawyer is discharged.

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

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

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

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

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

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

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

(7) Other good cause for withdrawal exists.

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

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

16 **II. ATTORNEY DECLARATION IN SUPPORT OF WITHDRAWAL**

17 1. I am counsel for Defendant in this action; I am over the age of 18
18 years; and I am a competent witness to testify to the matters contained in this
19 declaration.

20 2. The facts contained within this declaration are stated upon my
21 personal knowledge and are true, unless stated to be upon information and belief,
22 and in that case, I believe them to be true.

23 3. I cannot disclose the specific grounds for withdrawal within this
24 declaration on the basis that they may prejudice Defendant's case. However, I can
25 state that there is an irreconcilable and fundamental disagreement between counsel
26 and Defendant.

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4. Good cause exists for the immediate withdrawal of counsel in this case.

5. Counsel is willing to disclose specific facts in support of the request to withdrawal, but in recognition of ethical duties, requests that the disclosure be made to the presiding judge who may then determine, and advise the department's judge, whether good cause exists for the immediate withdrawal.

6. Based on recent events, Counsel does not believe that he can effectively represent Defendant in this matter any longer.

7. The recent events should not prevent Defendant from obtaining other counsel. Moreover, even if prospective new counsel is made aware of the events, it would not create a conflict for that new counsel as the events are specific to current counsel's representation of Defendant.

8. I have advised Defendant of the reasons for my impending withdrawal in this case, and notified her that I am filing a motion.

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9. Defendant's contact information is as follows:

Chalese Solinger
4657 Curdsen Way
Las Vegas, NV 89110
Tel.: (702) 575-7620
Email: curlyfriez09@gmail.com

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

Dated: September 21, 2021

Signed: /s/ Jack W. Fleeman

III. CONCLUSION

WHEREFORE, based on the foregoing, Jack W. Fleeman and Pecos Law Group respectfully request that the court grant their immediate withdrawal from this case.

DATED this 21st day of September 2021.

PECOS LAW GROUP

/s/ Jack W. Fleeman

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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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 21st day of September 2021, I served a copy of EMERGENCY MOTION FOR IMMEDIATE WITHDRAWAL OF ATTORNEY 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

via email;

- Adam M. Solinger attorneyadamsolinger@gmail.com
- admin email email@pecoslawgroup.com
- Alicia Exley alicia@pecoslawgroup.com
- Jack Fleeman jack@pecoslawgroup.com
- Angela Romero angela@pecoslawgroup.com

Chalese Solinger
4657 Curdsen Way
Las Vegas, NV 89110
curlyfriez09@gmail.com
Defendant

/s/ Angela Romero
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. P

**MOTION/OPPPOSITION
FEE INFORMATION SHEET**

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

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

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

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

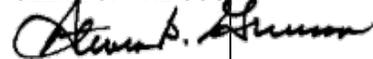
<input checked="" type="checkbox"/> \$0 The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because: <input checked="" type="checkbox"/> The Motion/Opposition is being filed in a case that was not initiated by joint petition. <input type="checkbox"/> The party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

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

The total filing fee for the motion/opposition I am filing with this form is: <input checked="" type="checkbox"/> \$0 <input type="checkbox"/> \$25 <input type="checkbox"/> \$57 <input type="checkbox"/> \$82 <input type="checkbox"/> \$129 <input type="checkbox"/> \$154
--

Party filing Motion/Opposition: Counsel for Defendant Date 09/21/2021

Signature of Party or Preparer /s/ Angela Romero



1 **EPAP**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,)
Defendant.)

11 **EX PARTE APPLICATION FOR AN ORDER SHORTENING**
12 **TIME ON DEFENDANT’S EMERGENCY MOTION FOR**
13 **IMMEDIATE WITHDRAWAL OF ATTORNEY**

13 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL
14 SOLINGER, and respectfully moves that, pursuant to EDCR 5.513, the
15 Court shorten time in which to hear Defendant’s EMERGENCY MOTION
16 FOR IMMEDIATE WITHDRAWAL OF ATTORNEY

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1 **DECLARATION OF ADAM MICHAEL SOLINGER**

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

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

7 2. Trial was set to resume in this matter on Friday September 17,
8 2021 at 9:30 a.m. Defense Counsel Fleeman sent an email to the Court
9 and the Plaintiff early that morning indicating that he was sick, would be
10 unable to conduct the trial, that he was the only one prepared to handle
11 the trial fully, and that he was requesting a continuance.

12 3. The Court granted the request and reset trial for a full day on
13 September 27th and a half day on September 28th.

14 4. Yesterday, September 21st, 2021, Fleeman filed an emergency
15 motion to withdraw citing a variety of reasons.

16 5. I voraciously oppose this request for multiple reasons that
17 are more appropriately addressed at a hearing on this motion. Put
18 shortly given the compressed time frame, Alicia Exley was trying to
19 resolve the financial side of the case with me as of approximately 12:30
20 p.m. yesterday and Fleeman filed his motion at 5:50 p.m. The motion
21 would have to mean that the conflict arose during those approximate 5

1 hours which seems far-fetched. Additionally, I have several other
2 concerns I look forward to addressing at a hearing on the motion. For
3 example, Fleeman is literally in the middle of cross-examining Dr.
4 Paglini and it's unclear how Exley was unable to fill in for him on
5 September 17th but a brand new attorney would come in and complete
6 the examination.

7 6. Fleeman's request to have this matter decided without oral
8 argument is grossly inappropriate. Additionally, there is no procedural,
9 statutory, or local rules based mechanism to have the Chief Judge hear
10 the request to withdraw. This Court must hear the motion which
11 amounts to an emergency request to withdraw AND an emergency
12 motion for a continuance. There is no legally permissible way for this
13 Court to transfer the motion to the Chief Judge for a decision. Thus, this
14 Court must make a decision based upon the utter void of what's been
15 presented.

16 7. This request should be viewed with an overdose of
17 skepticism because I had to file the request to shorten time, not
18 Fleeman. Had this been an emergency and a true request, Fleeman
19 would have filed an OST. But he did not because he wants a default
20 continuance.

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EXHIBIT A

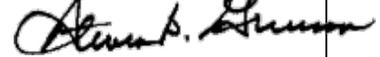
1 **OST**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
6 Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
8 Plaintiff,) Department: P
9 vs.)
10 CHALESE MARIE SOLINGER,)
Defendant.)

11 **ORDER SHORTENING TIME ON DEFENDANT'S**
12 **EMERGENCY MOTION FOR IMMEDIATE WITHDRAWAL OF**
13 **ATTORNEY**

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1 **NNOP**

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

12 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.

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

23 Dept No. **P**

24 **NO ORAL ARGUMENT**
25 **REQUESTED**

26 **NON-OPPOSITION TO REQUEST FOR ORDER SHORTENING TIME;**
OPPOSITION TO FACTS CONTAINED WITHIN REQUEST FOR ORDER
SHORTENING TIME

27 **COMES NOW** Jack W. Fleeman, Esq. and PECOS LAW GROUP, attorneys
28 for Defendant, and hereby submit their Non-Opposition to Request for Order
29 Shortening Time; and Opposition to Facts Contained within Request for Order
30 Shortening Time.

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DECLARATION OF COUNSEL

1. I am not opposed to the Court shortening the time in which to hear counsel’s *Emergency Motion for Immediate Withdrawal of Attorney*.

2. The motion to withdraw was filed on September 21, 2021 (yesterday) around 5:50 p.m. I planned on submitting a request for OST this morning, but was waiting on a notice of hearing to be issued. Mr. Solinger filed his request for an OST at 9:34 a.m.

3. Mr. Solinger is correct that Alicia Exley, Esq. was in communication with him as recently as September 21, 2021, and that she was trying to settle the financial side of the case. I was also involved in working on the settlement of the financial issues.

4. Mr. Solinger’s opinion that a conflict arising in the 5 hours between the settlement offer and the filing of the emergency motion is irrelevant.

5. The event that triggered the motion to withdraw occurred at approximately 12:50 p.m. Ms. Exley sent the proposed settlement offer to Mr. Solinger at 12:36 p.m., 14 minutes earlier. As such, the issue in fact arose *after* Ms. Exley sent the offer, despite what Mr. Solinger might imagine.

6. Immediately following the triggering event, Ms. Exley and I consulted with Bruce Shapiro, Esq. After a discussion that spanned from approximately 1:00 p.m. to 2:00 p.m., it was agreed that a withdraw from the case was the only option.

1 7. I drafted the motion to withdraw after my conversation with Ms.
2 Exley and Mr. Shapiro.

3 8. After drafting the motion, as I believe I am obligated to do, I
4 communicated with Chalese that I was filing a motion to withdraw and detailed
5 the reasons why.
6

7 9. It was only after I communicated to Chalese about the coming motion
8 to withdraw that I was able to file the motion.

9 10. As to Mr. Solinger's concerns about continuing trial, especially with
10 new counsel, my response is as follows:
11

12 a. Mr. Solinger states that he does not understand how a new
13 attorney could fill in to cross-examine Dr. Paglini. The court
14 should not forget that Mr. Solinger asked for this judge to be
15 disqualified, which would have resulted in a new judge sitting
16 for the remainder of Dr. Paglini's cross. As such, as that new
17 judge would have had to do, a new attorney will have to watch
the video and continue with cross. Mr. Fleeman is also more
than willing to provide new counsel with the remaining trial
exam questions, if necessary.

18 b. Mr. Solinger's actions this week would likely have
19 necessitated at least one additional trial date. Mr. Solinger
20 stated on the record at the first trial date that he would ensure
21 that his significant other, Jessica, was present and that no
22 additional subpoena would be necessary. However, this week,
23 Mr. Solinger stated that she will not be present because of
24 surgery, and refused to agree that there should be an additional
25 date for her testimony. A motion on that issue was to be filed
26 yesterday, but with the conflict and inability to obtain
Chalese's approval to file, it was not. I have attached the draft
motion, which details the issue for the court. *See Exhibit "A."*
The motion details Mr. Solinger's continued poor behaviors in
this case, which includes his utter inability to reasonably agree
to anything.

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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 22nd day of September 2021, I served a copy of NON-OPPOSITION TO REQUEST FOR ORDER SHORTENING TIME AND OPPOSITION TO FACTS CONTAINED WITHIN REQUEST TO SHORTEN TIME 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

via email;

- Adam M. Solinger attorneyadamsolinger@gmail.com
- admin email email@pecoslawgroup.com
- Alicia Exley alicia@pecoslawgroup.com
- Jack Fleeman jack@pecoslawgroup.com
- Angela Romero angela@pecoslawgroup.com

Chalese Solinger
4657 Curdsen Way
Las Vegas, NV 89110
curlyfriez09@gmail.com
Defendant

/s/ Angela Romero
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. P

**MOTION/OPPPOSITION
FEE INFORMATION SHEET**

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

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

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

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

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

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

The total filing fee for the motion/opposition I am filing with this form is: <input checked="" type="checkbox"/> \$0 <input type="checkbox"/> \$25 <input type="checkbox"/> \$57 <input type="checkbox"/> \$82 <input type="checkbox"/> \$129 <input type="checkbox"/> \$154
--

Party filing Motion/Opposition: Counsel for Defendant Date 09/22/2021

Signature of Party or Preparer /s/ Angela Romero

EXHIBIT A

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

12 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.

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

23 Dept No. **P**

24 **NO ORAL ARGUMENT**
25 **REQUESTED**

26 **DEFENDANT’S MOTION FOR A FOURTH TRIAL DATE AND FEES**

27 **COMES NOW** Defendant **Chalese Marie Solinger** (“Chalese”) by and
28 through her attorneys, **Jack W. Fleeman, Esq.**, and **Alicia S. Exley, Esq.**, of
29 PECOS LAW GROUP and moves this Court to set a fourth trial date so that Jessica
30 Sellers may testify as a witness; or alternatively, that the court re-set all future
31 dates so that trial can resume, with Jessica appearing on the same dates as other

1 witnesses. Chalese is further requesting that she be awarded her fees for having to
2 file this motion.

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

7 DATED this 21st day of September, 2021.

8 PECOS LAW GROUP

9
10 /s/ Alicia S. Exley, Esq.

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*

1 5. During the first day of trial, Adam interrupted Mr. Fleeman's cross
2 examination of Dr. Paglini, at Time Stamp 3:48:54 PM, and the following
3 exchange occurred:

4 Adam: Your Honor, briefly, can we take care of one housekeeping
5 matter, just as the day goes on? It's just that Michael's getting out of
6 school, and Defense Counsel has subpoenaed Jessica, my significant
7 other, so I would need to make arrangements if she needs to leave and
8 report, or I can represent –

9 The Court: I don't think we are going to have time to get to her.

10 Adam: I understand, but I just don't want any argument that I, because
11 technically Counsel, although Pro Per, advised her not to report. So I
12 would just ask that to the extent that I can represent she will be here
13 on June 14th, if the Defense releases her from her subpoena for today,
14 just so that we're not –

15 The Court: I don't have any problems with that. We're not going to
16 make it to her today.

17 Mr. Fleeman: As long as the representation is she'll be here.

18 Adam: She will be here because I need her for my case.

19 ***Mr. Fleeman: Do we need to subpoena her again?***

20 ***Adam: No. I will represent that I am bringing her for my case***
21 ***because, as Mr. Fleeman alluded to earlier, I can only lay the***
22 ***foundation for certain necessary videos through her, so I'm***
23 ***representing, as not only Plaintiff but as the counsel for two***
24 ***different State Bars that I will make sure that she is here.***

25 6. The second date of trial, set previously for June 14, 2021, was then
26 continued solely as the result Plaintiff's motion to disqualify the judge in this case.

1 7. Based on Adam’s specific representations on the record that Mr.
2 Fleeman did not need to subpoena Jessica, and that he “*will make sure that she is*
3 *here*” the next day of trial, Chalese’s counsel did not subpoena Jessica to the
4 second day of trial.

5 8. The second date of trial was set for September 17, 2021. Early in the
6 morning hours of September 17, 2021, Chalese’s lead counsel, Mr. Fleeman,
7 became ill.

8 9. As a result of Mr. Fleeman’s illness, a hearing to set another trial date
9 took place on the morning of September 17, 2021. At the end of the hearing,
10 Adam stated that he needed to address a housekeeping issue. Adam then alleged
11 that he had trouble subpoenaing Chalese’s boyfriend, Josh, and asked that Mr.
12 Fleeman guarantee Josh’s appearance. To that, Mr. Fleeman noted that he did not
13 believe that Adam had listed Josh as witness, but that he would need to check.

14 10. Adam then advised the court that his significant other was having
15 surgery soon and that he may need to leave the second date of trial, re-set for
16 September 27, 2021 if there were an issue. The court asked if December dates
17 worked for the parties, and Adam represented that he had a trial in December. Mr.
18 Fleeman, who again was ill at the time, did not think to ask how Jessica would be
19 appearing, as Adam had previously promised, if she were having a surgery.

20 11. On September 20, 2021, Chalese’s counsel, Ms. Exley, asked Adam
21 “Could you please confirm that Jessica will be present at the next day of trial?”
22
23
24

1 a. In response, Adam stated, “She absolutely will not be present” because she was
2 having surgery.²

3 12. Ms. Exley advised that if Jessica was unable to testify on September
4 27th or September 28th that another day of trial would be needed, as Chalese
5 required her testimony. Adam responded, “*Then you should have served her like*
6 *I served Josh.*”³

7
8 13. Mr. Fleeman then reminded Adam he advised the Court he would
9 ensure Jessica’s presence at the next trial date.

10 14. In response, Adam took a shot at Mr. Fleeman about being sick and
11 told him he “should have addressed it with the court” and that Chalese had “ample
12 time to serve her.” Adam made this statement despite his clear representation, on
13 the record, that counsel *would not have to serve her* for the next trial date.

14 15. Counsel is sympathetic to the fact Jessica is having surgery and had
15 hoped Adam would simply stipulate to setting a fourth trial date to accommodate
16 Jessica’s testimony. Unfortunately, although not unsurprisingly, Adam has refused
17 to agree to that, so now Chalese must request the same from the Court.

18
19 16. This is the second motion related to trial that Chalese has had to file
20 because Adam refused a reasonable request. The first was so Chalese’s expert –
21 who is in his 60’s and resides in Reno – could testify virtually due to the
22

23 ² See Emails between Counsel and Adam attached as exhibit “A.”

24 ³ See *Id.*

1 pandemic. Despite that request being in line with the court's administrative orders,
2 Adam objected, demanding that the expert appear in person. Chalese prevailed on
3 that motion.

4 17. Counsel has made a reasonable offer to accommodate Adam's
5 significant other even after Adam represented in Court, on the record, that he
6 would ensure her presence at trial. Therefore, Chalese should be awarded her fees
7 for having to file this motion.

9 **II. LEGAL ARGUMENT**

10 **A. THE COURT SHOULD SET A FOURTH TRIAL DATE SO JESSICA 11 **SELLERS CAN TESTIFY.****

12 EDCR 1.75 gives this Court the authority to set trial and hearing times.
13 Chalese's counsel does not expect Jessica to testify after immediately after having
14 surgery. However, counsel expects that Adam should act reasonably when
15 arranging her presence at a future date. Counsel made very clear to Adam and the
16 Court that Jessica's testimony is necessary for Chalese's case, and she was already
17 subpoenaed before. The only reason that Jessica was released from the subpoena,
18 and was not subpoenaed again, was Adam's representation that she did not need to
19 be subpoenaed again and that he would make sure she was present at the next day
20 of trial.
21

22 Adam does not care that he told this Court that he would ensure that Jessica
23 would be present for trial; nor does he care that Mr. Fleeman explained he
24

1 understood that Jessica was having surgery and would like another date for her
2 testimony. Adam’s response, which was unbecoming of an “officer of the court”⁴
3 – a fact that Adam has routinely touted when it suits him in this case – was as
4 follows:

5
6 If you absolutely needed her there then you should have
7 served her, you have known about this trial date as long
8 as I have, you have had ample time to do so. *I*
9 *don't understand how you can sit here and expect her*
10 *to be there when you couldn't even make it to trial*
11 *with a little stomach bug, yet you are expecting her to*
12 *show up for trial after surgery, especially after not even*
13 *serving her?*

14 Adam’s commentary, aside from the sarcastic statement about Mr.
15 Fleeman’s “little stomach bug,” is essentially that Counsel should not have trusted
16 his representations on the record. Sadly, Adam is accurate on that point. He has
17 behaved reprehensibly throughout this case and Counsel cannot expect him to
18 behave in any reasonable fashion, at anytime.⁵

19 ⁴ Similar to his refrain that he is an “officer of the court,” at trial, Adam, in specific
20 response to whether Counsel would need to subpoena Jessica again, stated: “I’m representing, as
21 not only Plaintiff but *as the counsel for two different State Bars* that I will make sure that she is
22 here.” This perfectly demonstrates Adam’s attitude in this case. He thinks very highly of
23 himself, and imagines he is a professional beyond reproach. Yet, his actions and words, betray
24 him.

25 ⁵ As the court is aware, Adam previously made personal comments about Mr. Fleeman’s
26 election campaign, which had nothing to do with the case; he filed a frivolous motion to remove
the judge; and he has made it no secret that he believes Chalese is a horrible person who should
have minimal time with the children.

1 Chalese is requesting, because Adam refuses to agree, that the Court set
2 another half-day of trial so that Jessica can testify. Alternatively, the request is
3 that all trial dates be moved so that Jessica can be subpoenaed to appear on a date
4 when other witnesses are also to appear.
5

6 **B. CHALESE SHOULD BE AWARDED ATTORNEY’S FEES.**

7 EDCR 7.60(b)(3) allows for sanctions in the form of attorney’s fees when a
8 party “[s]o multiplies the proceedings in a case as to increase costs unreasonably
9 and vexatiously.”
10

11 Further, Administrative Order 21-04, which is still in effect, states:

12 Attorneys, as officers of the Court, have ethical obligations for cooperative civility
13 under normal circumstances. This Court, under the present circumstances, reminds
14 attorneys that they have an obligation to cooperate with the Courts and one
15 another as we all navigate these challenging circumstances. This is not the time to
16 press for unwarranted tactical advantages, unreasonably deny continuances or
17 other accommodations, or otherwise take advantage of the challenges presented
18 due to the current pandemic. Lawyers are expected to be civil, professional, and
19 understanding of their colleagues, parties and witnesses who are ill or otherwise
20 unable to meet obligations because of the current restrictions.
21

22 As stated, Chalese’s Counsel did not have Jessica subpoenaed a second time
23 to trial because when Counsel asked, on the record, if she needed to be
24

1 subpoenaed again, Adam represented to the Court, “No. I will represent that I am
2 bringing her for my case ... I’m representing, as not only Plaintiff but as the
3 counsel for two different State Bars that I will make sure that she is here.”
4

5 The only reason why the second day of trial did not occur in June 2021 was
6 due to Adam’s motion to disqualify this Court, which was denied and which
7 Adam did or should have known would delay trial. Though the September 17th
8 trial date was delayed due to Mr. Fleeman’s illness, Adam should have known that
9 another day of trial would likely be set, as he asked the Court on September 17th to
10 set two more trial dates instead of one – meaning that there was no guarantee that
11 Adam would finish his case-in-chief and Chalese would call Jessica on September
12 17th.
13

14 When counsel reached out to Adam about Jessica appearing at trial, as he
15 confirmed he would arrange on the record, his response was that Chalese should
16 have subpoenaed her regardless of Adam’s representations to the Court. Chalese’s
17 Counsel offered to accommodate Jessica by suggesting that another date simply be
18 set to allow her time to recover from her surgery, but Adam would not even
19 entertain the idea. Adam’s unreasonable position has caused Chalese to
20 unnecessarily incur fees.
21

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III. CONCLUSION

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

1. A fourth trial date from the Court to accommodate Jessica Sellers' testimony;
2. Alternatively, that the Court reset all trial dates so that Jessica Sellers' may testify on a date when other witnesses will also be called;
3. An order of attorney's fees; and
4. For other and further relief as the Court deems proper.

DATED this 21st day of September 2021.

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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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 21st day of September 2021, I served a copy of DEFENDANT’S MOTION FOR A FOURTH TRIAL DATE AND FEES 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:

- | | |
|------------------|--------------------------------|
| Adam M. Solinger | attorneyadamsolinger@gmail.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

1 **OST**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4
Eighth Judicial District Court
5 Family Division
Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,)
Defendant.)

10
11 **ORDER SHORTENING TIME ON DEFENDANT'S**
12 **EMERGENCY MOTION FOR IMMEDIATE WITHDRAWAL OF**
13 **ATTORNEY**

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DISTRICT COURT
CLARK COUNTY, NEVADA

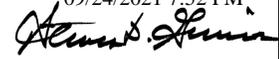
Adam Michael Solinger, Plaintiff	CASE NO: D-19-582245-D
vs.	DEPT. NO. Department P
Chalese Marie Solinger, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order Shortening Time was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 9/22/2021

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
Jack Fleeman	jack@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com
admin email	email@pecoslawgroup.com
Alicia Exley	alicia@pecoslawgroup.com
Adam Solinger	adam@702defense.com
Louis Schneider	lcslawllc@gmail.com
Adam Solinger	attorneyadamsolinger@gmail.com


CLERK OF THE COURT

1 **OWAR**

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

12 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.

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

Dept No. **P**

Date of Hearing: **September 24, 2021**

Time of Hearing: **9:00 a.m.**

23 **ORDER TO WITHDRAW AS COUNSEL OF RECORD**

24 THIS CAUSE having come before the Court by way of Jack W. Fleeman,
25 Esq. and PECOS LAW GROUP'S *Emergency Motion for Immediate Withdrawal of*
26 *Attorney* filed on September 21, 2021, which was timely served on Defendant and
27 Plaintiff on September 21, 2021; the Court hearing oral argument on the motion at
28 the hearing on September 24, 2021 at 9:00 a.m.; and the Court having reviewed

1 the pleadings and other documents filed in this case by all parties hereto, and good
2 cause appearing therefore, this Court finds as follows:

3 **THE COURT HEREBY FINDS** that there is good cause to grant the
4 withdrawal of attorney.

5 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Jack
6 W. Fleeman, Esq. and PECOS LAW GROUP'S request to withdraw as counsel of
7 record for Defendant, **Chalese Marie Solinger**, is hereby granted.

8 **IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that all
9 subsequent pleadings and correspondence regarding the aforementioned case are
10 to be forwarded directly to Defendant, **Chalese Marie Solinger**, in Proper Person
11 at the following contact information:

12 ...
13 ...
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Chalese Marie Solinger
4657 Curdsen Way
Las Vegas, NV 89110
Tel.: (702) 575-7620
Email: curlyfriez09@gmail.com
Defendant

Dated this 24th day of September, 2021



Respectfully submitted by:

PECOS LAW GROUP

219 22E 06F8 57D8
Mary Perry
District Court Judge

/s/ Jack W. Fleeman, 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

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Adam Michael Solinger, Plaintiff	CASE NO: D-19-582245-D
vs.	DEPT. NO. Department P
Chalese Marie Solinger, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order to Withdraw as Attorney of Record was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 9/24/2021

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
Jack Fleeman	jack@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com
admin email	email@pecoslawgroup.com
Alicia Exley	alicia@pecoslawgroup.com
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Louis Schneider	lcsllawllc@gmail.com
Adam Solinger	attorneyadamsolinger@gmail.com



1 **NEOJ**
2 **Jack W. Fleeman, Esq.**
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Nevada Bar No. 14192
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7 Jack@pecoslawgroup.com
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8 **DISTRICT COURT**
9 **FAMILY DIVISION**
10 **CLARK COUNTY, NEVADA**

11 **Adam Michael Solinger,**

Plaintiff,

12 vs.

13 **Chalese Marie Solinger,**

14 Defendant.

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

Dept No. **P**

15
16 **NOTICE OF ENTRY OF ORDER TO WITHDRAW AS**
17 **COUNSEL OF RECORD**

18 TO: **Adam Michael Solinger**, Plaintiff in Proper Person:

19 TO: **Chalese Marie Solinger**, Defendant in Proper Person:

20 **YOU WILL PLEASE TAKE NOTICE** that the “**Order to Withdraw as**
21 **Counsel of Record**” was entered in the above-captioned case on the **24th** day of
22 **September 2021**, by filing with the clerk. A true and correct copy of said Order is
attached hereto and made a part hereof.

23 **DATED** this 27th day of September, 2021

24 /s/ Alicia S. Exley, Esq.

Alicia S. Exley, Esq.

Nevada Bar No. 14192

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

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CERTIFICATE OF SERVICE

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

via email;

Adam M. Solinger attorneyadamsolinger@gmail.com

admin email email@pecoslawgroup.com

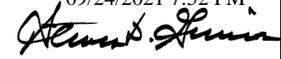
Alicia Exley alicia@pecoslawgroup.com

Jack Fleeman jack@pecoslawgroup.com

Angela Romero angela@pecoslawgroup.com

Chalese Solinger
4657 Curdsen Way
Las Vegas, NV 89110
curlyfriez09@gmail.com
Defendant

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


CLERK OF THE COURT

1 **OWAR**
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
12 Alicia@pecoslawgroup.com
13 Attorneys for Defendant

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

10 **Adam Michael Solinger,**

11 Plaintiff,

12 vs.

13 **Chalese Marie Solinger,**

14 Defendant.

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

Dept No. **P**

Date of Hearing: **September 24, 2021**

Time of Hearing: **9:00 a.m.**

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17 THIS CAUSE having come before the Court by way of Jack W. Fleeman,
18 Esq. and PECOS LAW GROUP'S *Emergency Motion for Immediate Withdrawal of*
19 *Attorney* filed on September 21, 2021, which was timely served on Defendant and
20 Plaintiff on September 21, 2021; the Court hearing oral argument on the motion at
21 the hearing on September 24, 2021 at 9:00 a.m.; and the Court having reviewed
22

1 the pleadings and other documents filed in this case by all parties hereto, and good
2 cause appearing therefore, this Court finds as follows:

3 **THE COURT HEREBY FINDS** that there is good cause to grant the
4 withdrawal of attorney.

5 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Jack
6 W. Fleeman, Esq. and PECOS LAW GROUP'S request to withdraw as counsel of
7 record for Defendant, **Chalese Marie Solinger**, is hereby granted.

8 **IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that all
9 subsequent pleadings and correspondence regarding the aforementioned case are
10 to be forwarded directly to Defendant, **Chalese Marie Solinger**, in Proper Person
11 at the following contact information:

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Chalese Marie Solinger
4657 Curdsen Way
Las Vegas, NV 89110
Tel.: (702) 575-7620
Email: curlyfriez09@gmail.com
Defendant

Dated this 24th day of September, 2021



Respectfully submitted by:

PECOS LAW GROUP

219 22E 06F8 57D8
Mary Perry
District Court Judge

/s/ Jack W. Fleeman, 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

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Adam Michael Solinger, Plaintiff	CASE NO: D-19-582245-D
vs.	DEPT. NO. Department P
Chalese Marie Solinger, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order to Withdraw as Attorney of Record was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 9/24/2021

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
Jack Fleeman	jack@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com
admin email	email@pecoslawgroup.com
Alicia Exley	alicia@pecoslawgroup.com
Adam Solinger	adam@702defense.com
Louis Schneider	lcsllawllc@gmail.com
Adam Solinger	attorneyadamsolinger@gmail.com

1 **ORDER**
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

5
6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,) Date of Hearing: September 27,
2021)
10 Defendant.) Time of Hearing: 9:30 a.m.

11 **ORDER FROM SEPTEMBER 27, 2021 HEARING**

12 THIS MATTER came on for a hearing before this Court on the 27th
13 day of September, 2021, Plaintiff, **Adam Michael Solinger** (“Adam”),
14 present; and Defendant, **Chalese Marie Solinger** (“Chalese”) present
15 and the Court being fully advised in the premises and good cause
16 appearing makes the following findings and orders:

17 THE COURT STATES that in the interest of public safety due to
18 the Coronavirus pandemic, all parties were present via VIDEO
19 CONFERENCE through the Bluejeans application.

20 THE COURT STATES that Attorney Jack Fleeman is not present
21 as he was permitted to withdraw from the matter pursuant to a

1 previously issued oral ruling that has not been entered as of the date and
2 time of this hearing.

3 THE COURT ORDERS that a status check on confirmation of new
4 counsel for the Defendant is set for November 10, 2021 at 9:00 a.m.

5 THE COURT ACKNOWLEDGES that the Plaintiff is a practicing
6 attorney and that he has upcoming jury trials in other matters.

7 THE COURT ORDERS that the minor children shall be tested for
8 COVID-19.

9 THE COURT ALSO ORDERS that the Defendant shall notify the
10 Plaintiff of her COVID-19 test results.

11 THE COURT ORDERS that the Plaintiff's Spousal Support
12 obligation shall cease effective November 1, 2021.

13 THE COURT FURTHER ORDERS that the Defendant's Child
14 Support obligation shall not be changed at this time.

15 THE COURT STATED that as a result there will be flexibility in
16 scheduling.

17 THE COURT ORDERS that the Trial in this matter set to resume
18 today, September 27, 2021, is continued to December 10, 2021 at 9:00
19 a.m. for a full day trial.

20
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1 THE COURT FURTHER ORDERS that another half day of trial is
2 scheduled for December 17, 2021 at 9:00 a.m. in the event the parties
3 need the additional time for trial.

4 IT IS FINALLY ORDERED that Mr. Solinger shall prepare the
5 order.

6 Dated this 20th day of October, 2021

7 
8

9 DISTRICT COURT JUDGE

10 57B 59E 6112 A3A3
Mary Perry
District Court Judge

11 Respectfully Submitted,
12 /s/ Adam M. Solinger
Adam M. Solinger
13 Plaintiff

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

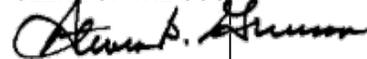
Adam Michael Solinger, Plaintiff	CASE NO: D-19-582245-D
vs.	DEPT. NO. Department P
Chalese Marie Solinger, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 10/20/2021

- | | |
|-----------------|--------------------------------|
| Vincent Mayo | VMGroup@TheAbramsLawFirm.com |
| Jack Fleeman | jack@pecoslawgroup.com |
| Angela Romero | angela@pecoslawgroup.com |
| admin email | email@pecoslawgroup.com |
| Alicia Exley | alicia@pecoslawgroup.com |
| Adam Solinger | adam@702defense.com |
| Louis Schneider | lcslawllc@gmail.com |
| Adam Solinger | attorneyadamsolinger@gmail.com |



1 **MOT**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
6 Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
7 Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,) **Hearing Requested**
10 Defendant.)

11 **MOTION TO EXPAND DISCOVERY TO INCLUDE UP TO DATE**
12 **APPCLOSE MESSAGES AND OTHER MESSAGES SENT BY**
13 **THE DEFENDANT**

14 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL
15 SOLINGER, and hereby submits his motion to expand discovery to
16 include updated messages between the parties that were exchanged via
17 the AppClose program, a text message Chalese sent to Adam, and
18 messages sent by Chalese to the mother of Jesse (Josh's son).

17 ///

18 ///

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3 Trial began in this case on May 10th, 2021. Discovery closed
4 approximately 30 days prior. Unfortunately, resumption of trial was
5 delayed until January of 2022 – over 6 months later.

6 During that time, many important developments have taken place
7 and Chalese must be questioned about them when trial resumes. For
8 example, Chalese abandoned the children with Jessica’s daughter while
9 Adam and Jessica were out of town. Chalese also did not take Marie to
10 school because Marie expressed a desire to go to Chalese’s work with her
11 instead. Chalese asked Adam how to obtain an emergency restraining
12 order via text message which was against the order to communicate
13 through the AppClose application that logs all messages.

14 Perhaps most troubling, Chalese sent a text message to Delores who
15 is the mother of Jesse, Josh’s son, wherein she expressed that Josh was
16 leaving her and that she “[has] three guns and a damn good fucking aim.”
17 When Delores tried to reason with Chalese by mentioning that both
18 Chalese and Delores have children to think about, Chalese retorted with:
19 “That’s what I’m being told.” Delores persisted in trying to reason with
20 Chalese by telling her that she deserves better than Josh and Chalese said
21 “I’ll carve it in a bullet lmao.”

1 There are countless other examples, but these serves to illustrate the
2 point that the updated messages between the parties and Chalese's
3 messages to Delores are necessary for purposes of concluding trial in
4 January of 2022 given that the case has dragged on for over 3 years.

5 **II. LAW AND ARGUMENT**

6 Simply put, this Court is tasked with deciding a custody schedule
7 based upon the best interest of the children. The Court needs all of the
8 most recent up to date information in order to do so because decisions
9 cannot be made in a stale vacuum that does not account for what's
10 occurred during the last six months.

11 **III. ATTEMPT TO RESOLVE PURSUANT TO 5.501**

12 Adam has reached out to Mr. Ghibaudo in an attempt to resolve this
13 without resorting to motion practice. Mr. Ghibaudo had indicated that he
14 was available to speak on Monday December 20th. Given the rapidly
15 approaching trial resumption, Adam is filing this motion to ensure there
16 is adequate time to brief and prepare the issue for the Court's
17 consideration. In the event that the defense stipulates to some, or all of
18 Adam's requests, Adam will file an amended motion to clarify what is still
19 at issue for the Court's consideration.

20 ///

21 ///

1 **IV. CONCLUSION**

2 Based upon the foregoing, Adam respectfully requests that this
3 Honorable Court permit discovery to be expanded to include the
4 AppClose messages between the parties from the prior close of discovery
5 to one week before trial, to allow admission of the text message Chalese
6 sent asking how to obtain an emergency restraining order, and to allow
7 Chalese to be questioned on her text messages that she sent to Delores.

8 Dated Tuesday, December 21, 2021.

9

Respectfully Submitted:

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/s/ Adam M. Solinger
Adam M. Solinger

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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 *EMERGENCY MOTION TO ADDRESS DEFENDANT’S INTENT TO WITHHOLD THE MINOR CHILDREN*

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 Tuesday, December 21, 2021.

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION TO EXPAND DISCOVERY TO INCLUDE UP TO DATE APPCLOSE MESSAGES AND OTHER MESSAGES SENT BY THE DEFENDANT**

was filed electronically with the Eighth Judicial District Court in the above-entitled manner, on December 21, 2021. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Alex Ghibaud, Esq.
Attorney for Defendant

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

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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. 1

**MOTION/OPPPOSITION
FEE INFORMATION SHEET**

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

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

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

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

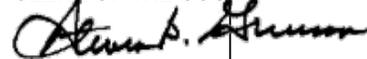
<input checked="" type="checkbox"/>	\$0	The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>		The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>		The party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

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

The total filing fee for the motion/opposition I am filing with this form is:						
<input checked="" 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 **EXHS**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
6 Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
8 Plaintiff,) Department: P
9 vs.)
10 CHALESE MARIE SOLINGER,)
Defendant.)

11 **EXHIBITS TO MOTION TO EXPAND DISCOVERY TO**
12 **INCLUDE UP TO DATE APPCLOSE MESSAGES AND OTHER**
MESSAGES SENT BY THE DEFENDANT

13 EXHIBIT A	Text Message From Chalese Inquiring About Emergency Protective Order
14 EXHIBIT B	Text Messages From Chalese to Delores

16 Dated Tuesday, December 21, 2021.

17 Respectfully Submitted,

18 /s/ Adam M. Solinger

19 Adam M. Solinger

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **EXHIBITS TO MOTION TO EXPAND DISCOVERY TO INCLUDE UP TO DATE APPCLOSE MESSAGES AND OTHER MESSAGES SENT BY THE DEFENDANT**

was filed electronically with the Eighth Judicial District Court in the above-entitled manner, on December 21, 2021. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Alex Ghibaud, Esq.
Attorney for Defendant

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

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EXHIBIT A



You can't meet me at the VA?

I'm getting bags ready to leave ASAP

Ok does that mean I'm meeting you at your house or the VA?

I litterallg fighting the clock to make it to someone before they die

My house please

Ok

I'm leaving right now

Thank you

I'm outside

Delivered

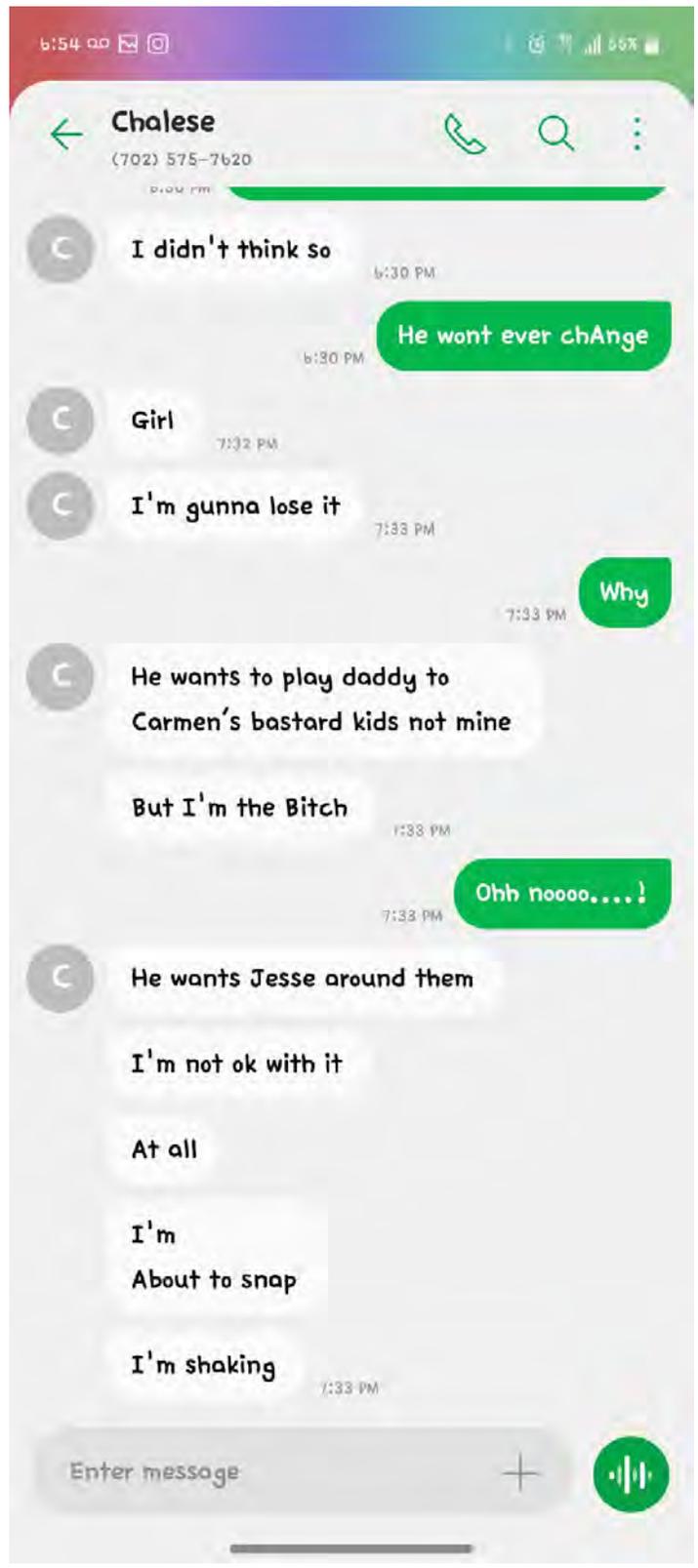
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How do I get an emergency restraining order

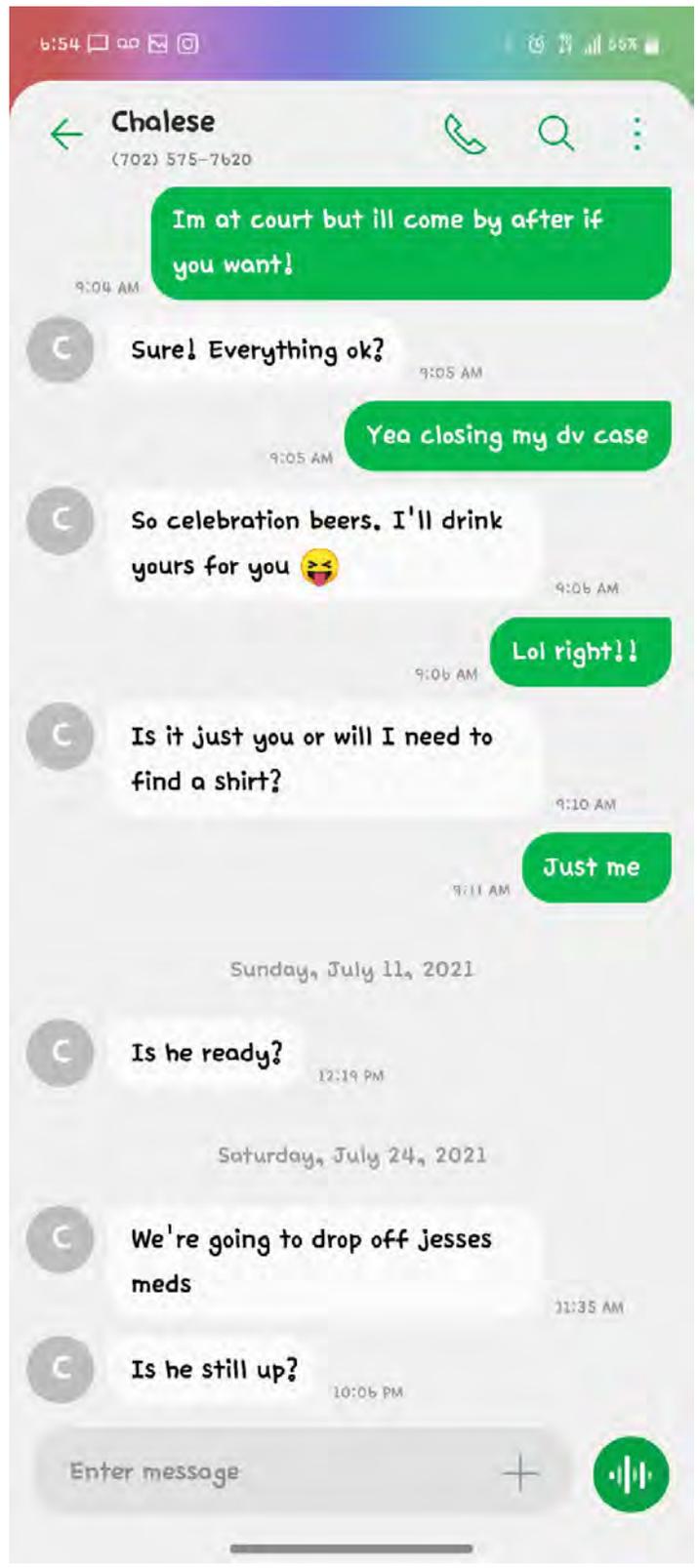
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EXHIBIT B

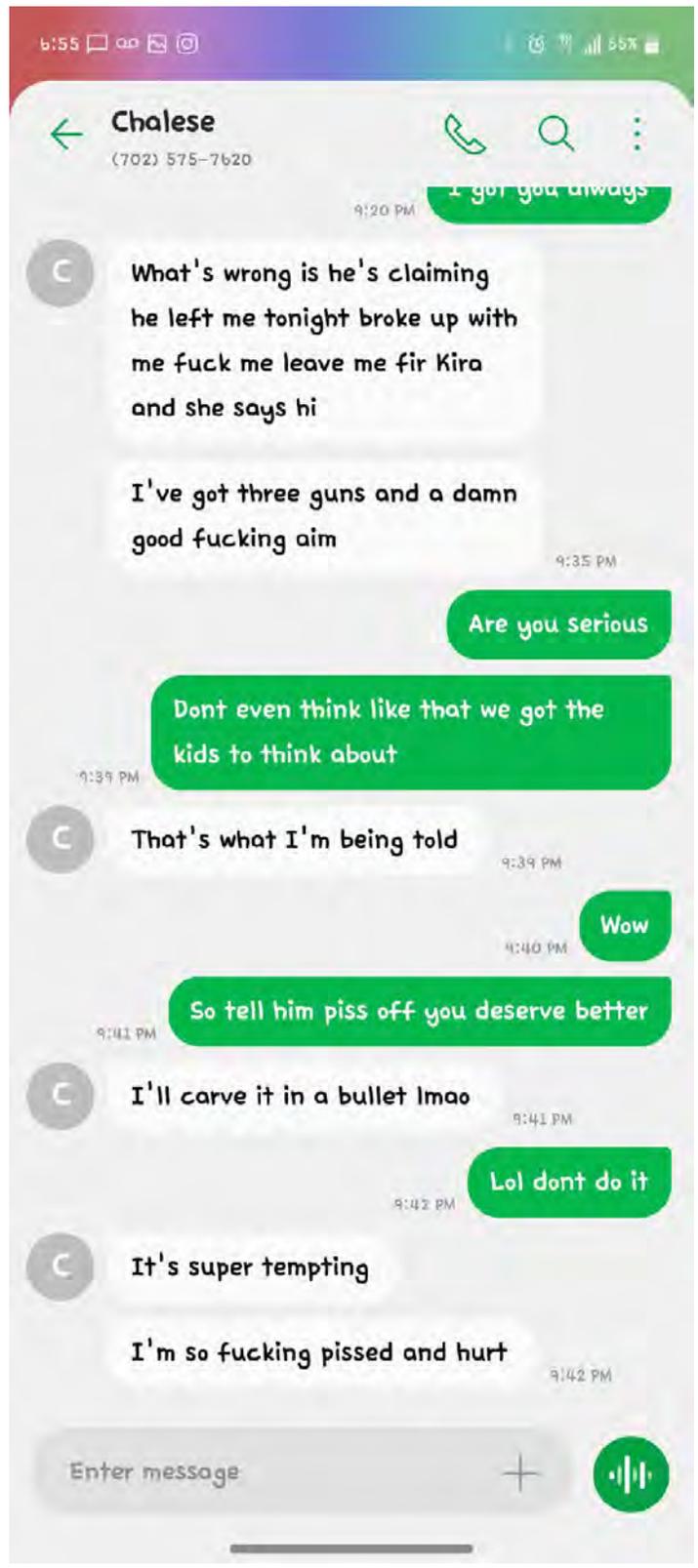
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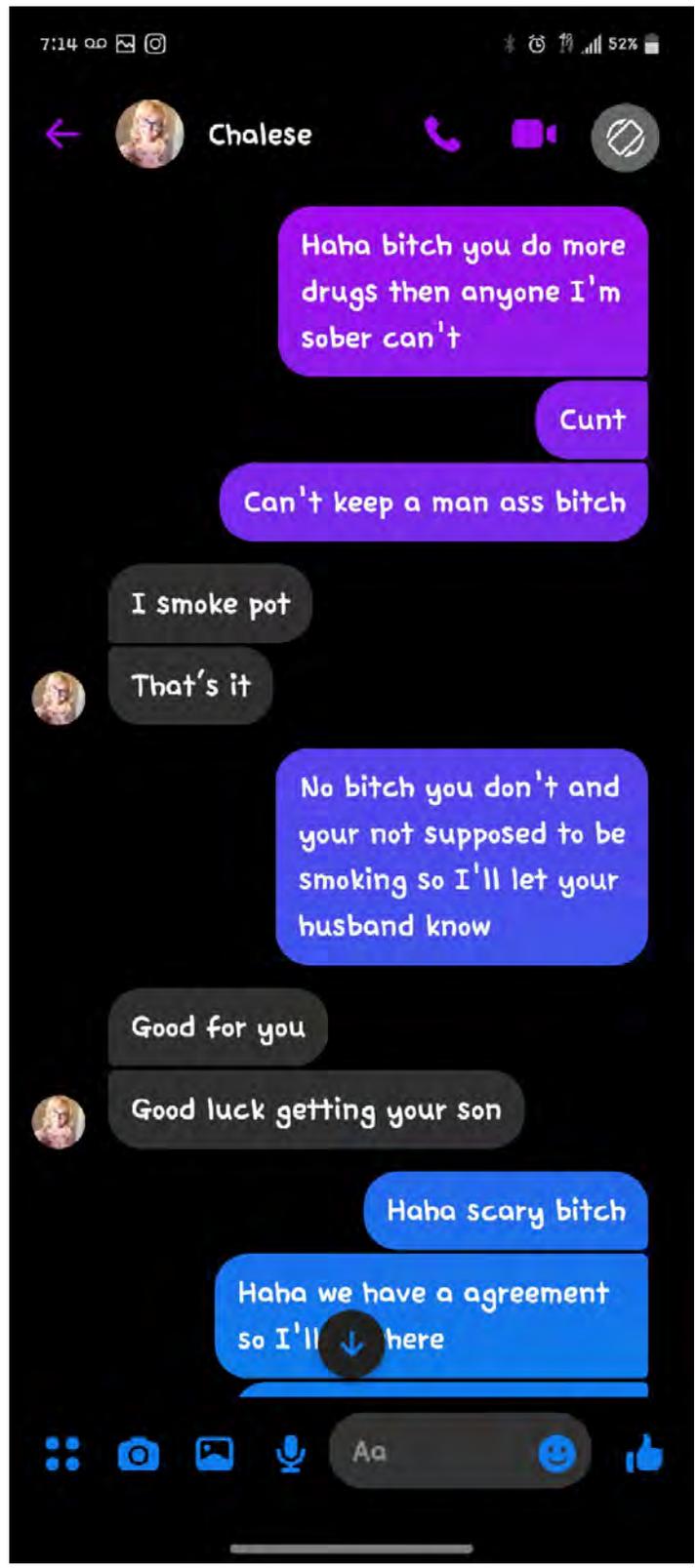
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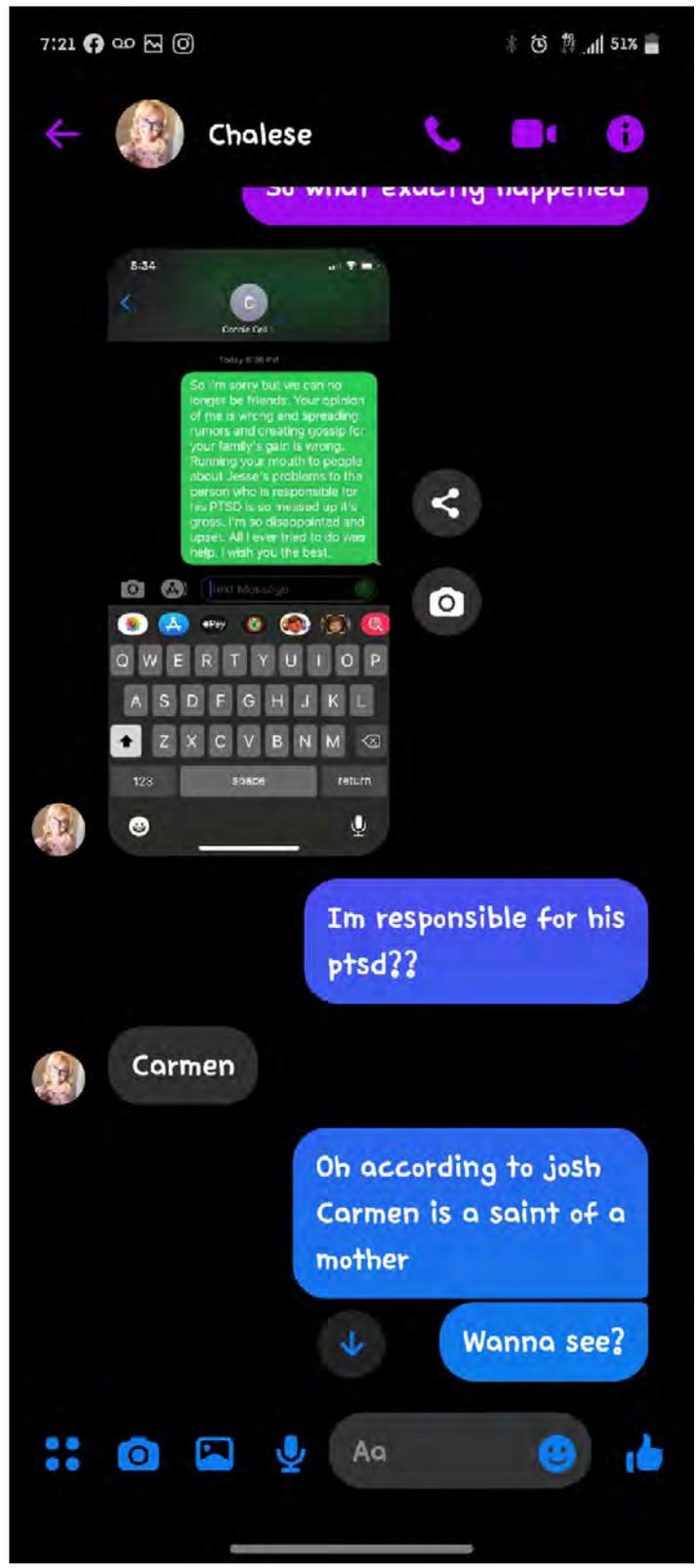
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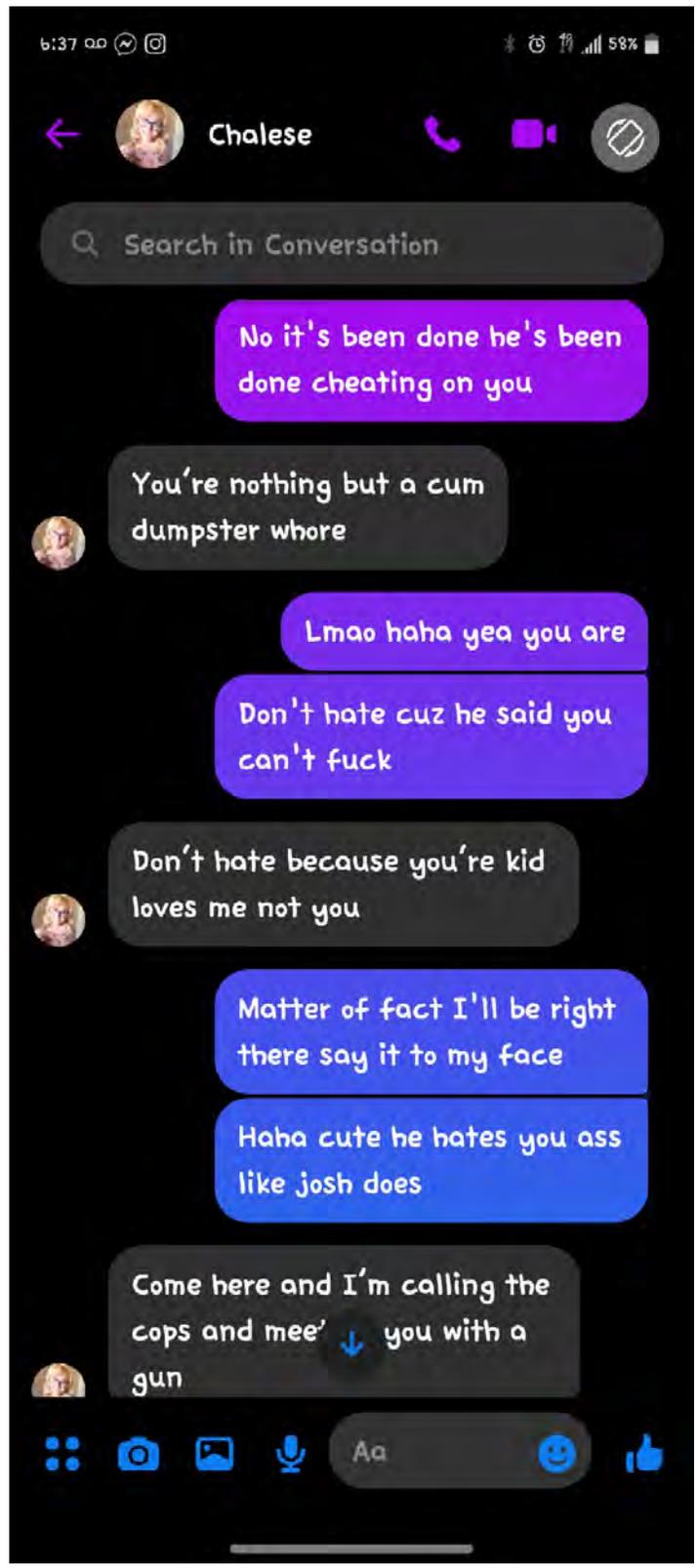
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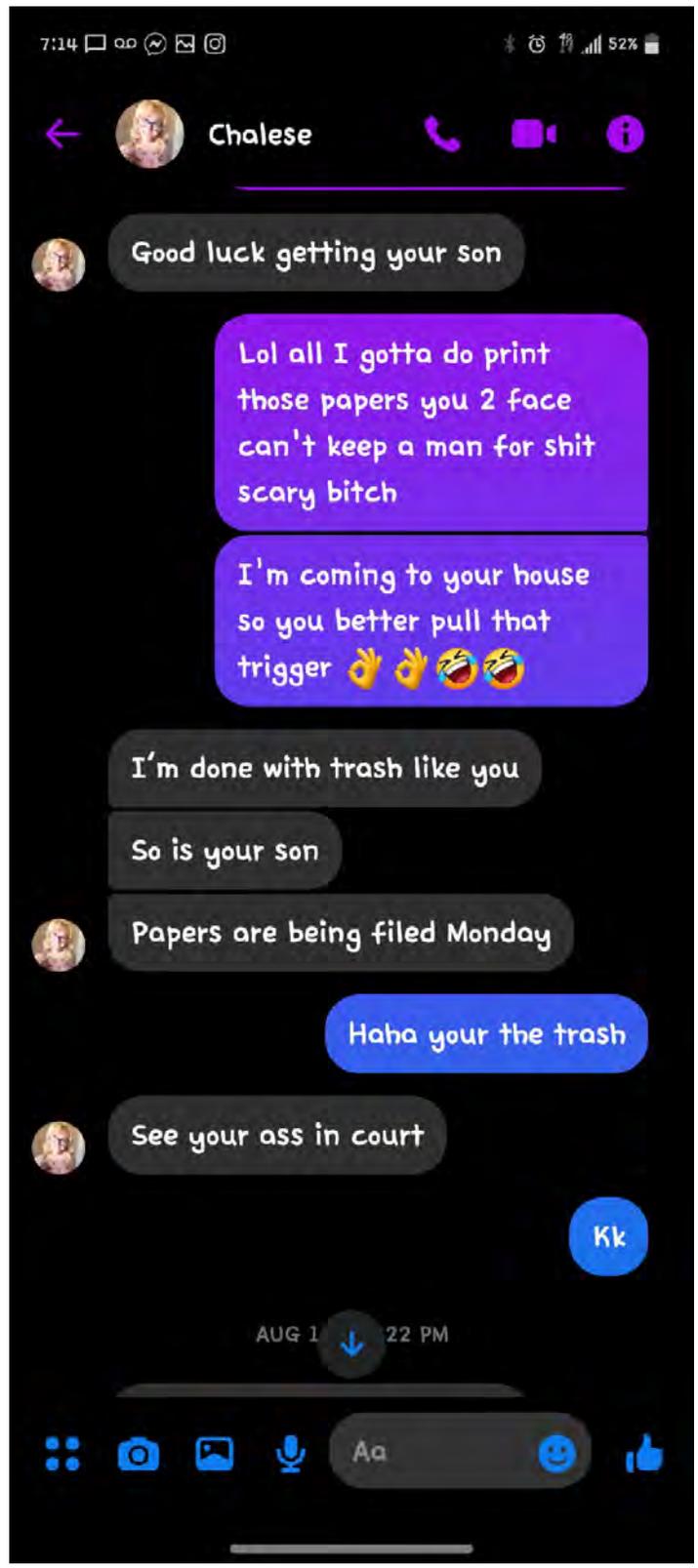
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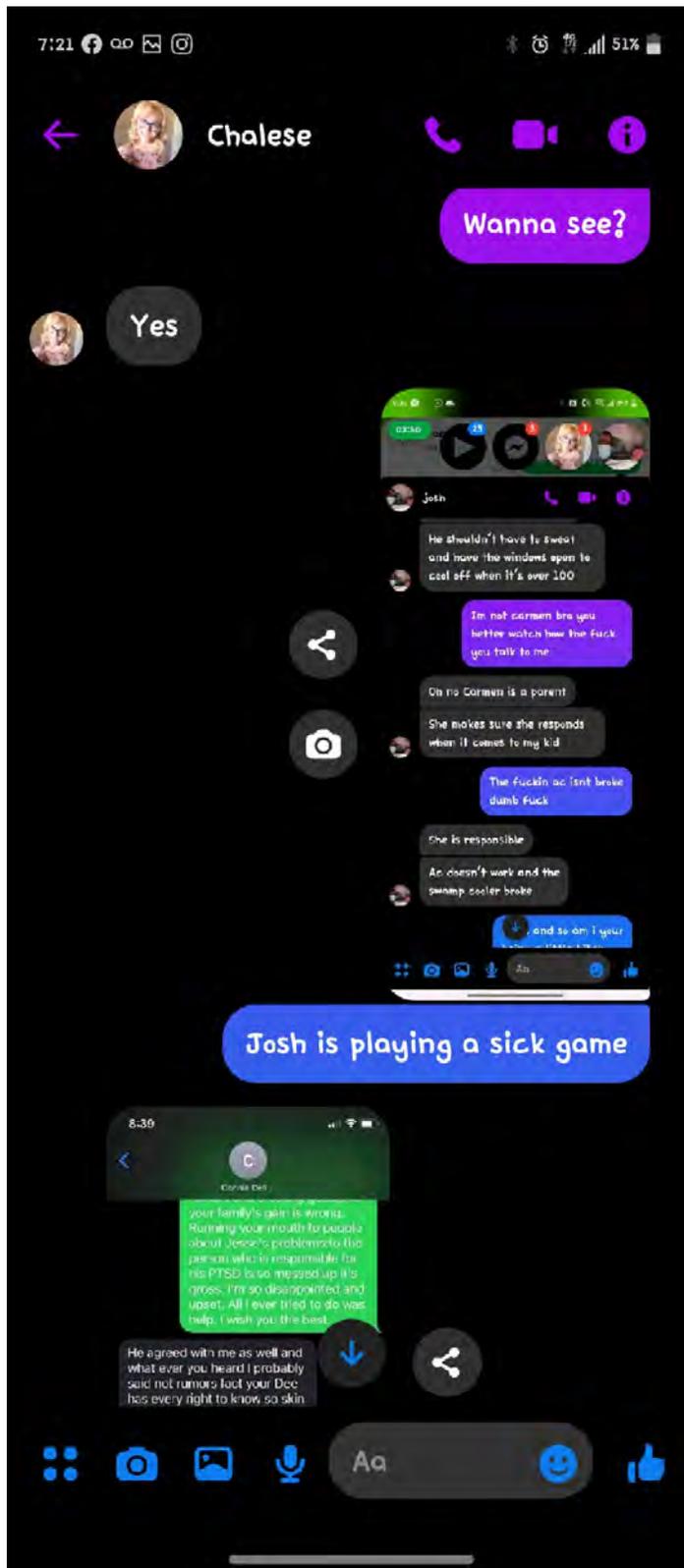
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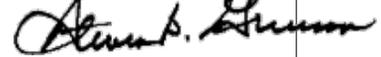


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1 **NOA**

2 Alex B. Ghibauda, Esq.
3 Nevada Bar Number: 10592
4 Michancy M. Cramer
5 Nevada Bar Number: 11545
6 **ALEX GHIBAUDO, PC**
7 197 E California Ave Suite 250
8 Las Vegas, Nevada 89104
9 T: (702) 462-5888
10 F: (702) 924-6553
11 E: alex@glawvegas.com
12 *Attorney for Defendant*

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

16 ADAM MICHAEL SOLINGER,

17 Plaintiff,

18 vs.

19 CHALESE MARIE SOLINGER,

20 Defendant.

Case Number: D-19-582245-D

Department P

21 **NOTICE OF APPEARANCE**

22 **COMES NOW** Attorneys MICHANCY M. CRAMER, ESQ. and ALEX B.
23 GHIBAUDO, ESQ., of ALEX B. GHIBAUDO, P.C. and hereby appears as counsel
24 for Defendant, CHALESE SOLINGER (“Chalese”) in the above captioned matter.
25

26 ...
27
28

1 Please forward all communication and documents to our office for further
2 handling.

3 Dated this 27th day of December, 2021.
4

5 Respectfully Submitted:
6

7
8 /s/ Michancy M. Cramer
9 Michancy M. Cramer, Esq.
10 Nevada Bar Number: 11545
11 **ALEX GHIBAUDO, PC**
12 197 E California Ave Suite 250
13 Las Vegas, Nevada 89104
14 T: (702) 462-5888
15 F: (702) 924-6553
16 E: alex@glawvegas.com
17 *Attorney for Defendant*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of December, 2021, I served a true and correct copy of the foregoing **NOTICE OF APPEARANCE**, via the Court designated electronic service program and/or U.S. Mail, first class postage prepaid, addressed to the following:

attorneyadamsolinger@gmail.com
email@pecoslawgroup.com

By: /s/Michancy M. Cramer
An Employee of ALEX B.
GHIBAUDO, P.C.

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ORDR
Alex B. Ghibaudo, Esq.
Nevada Bar Number: 10592
Michancy M. Cramer
Nevada Bar Number: 11545
ALEX GHIBAUDO, PC
197 E California Ave Suite 250
Las Vegas, Nevada 89104
T: (702) 462-5888
F: (702) 924-6553
E: alex@glawvegas.com
Attorney for Defendant

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

ADAM MICHAEL SOLINGER, Plaintiff, vs. CHALESE MARIE SOLINGER, Defendant.	Case Number: D-19-582245-D Department P
--	--

**DEFENDANT’S REQUEST AND ORDER TO RELEASE RECORDS TO
NEW COUNSEL**

COMES NOW Defendant, CHALESE SOLINGER (“Chalese”) and hereby requests that this Honorable Court issue an Order authorizing Pecos Law Group to release all CPS records, all expert reports, and all other documents and records regarding this case to Chalese’s new counsel, the undersigned Michancy M. Cramer, Esq.

1 Plaintiff has been very litigious throughout this case and has previously
2 opposed even releasing expert reports to rebuttal experts without authorization from
3 the Court.
4

5 **ORDER**

6 The Court being fully advised, pursuant to the Defendant's request and good
7 cause appearing:

8 **IT IS HEREBY ORDERED** that all CPS records, all expert reports, and all
9 other documents and records regarding this case that are in the possession of the
10 Pecos Law Group shall be released to Defendant's newly retained counsel,
11 Michancy M. Cramer, Esq.
12

Dated this 27th day of December, 2021

13 
14
15

16 Respectfully Submitted:

D69 A66 EB30 FC02
Mary Perry
District Court Judge

17
18 /s/ Michancy M. Cramer
19 Michancy M. Cramer, Esq.
20 Nevada Bar Number: 11545
21 **ALEX GHIBAUDO, PC**
22 197 E California Ave Suite 250
23 Las Vegas, Nevada 89104
24 T: (702) 462-5888
25 F: (702) 924-6553
26 E: alex@glawvegas.com
27 *Attorney for Defendant*
28

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

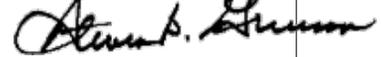
Adam Michael Solinger, Plaintiff	CASE NO: D-19-582245-D
vs.	DEPT. NO. Department P
Chalese Marie Solinger, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 12/27/2021

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1 **OPPC**
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4 Michancy M. Cramer
5 Nevada Bar Number: 11545
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12 *Attorney for Defendant*

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

16 ADAM MICHAEL SOLINGER,

Case Number: D-19-582245-D

17 Plaintiff,

Department P

18 vs.

19 CHALESE MARIE SOLINGER,

20 Defendant.

21 **DEFENDANT'S OPPOSITION**

22 **COMES NOW**, Defendant, CHALESE SOLINGER (“Chalese”), by and
23 through her attorney of record, MICHANCY M. CRAMER, ESQ., of ALEX
24 GHIBAUDO, P.C., and hereby files this *Opposition*.

25 This *Opposition* is based upon the attached Memorandum of Points and
26 Authorities, any supporting exhibits provided in on file herein, any/all pleadings
27 and papers on file herein, and any further evidence or argument presented to the
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Court at the hearing of this matter.

As set forth herein, Chalese respectfully requests that the Court:

1. Enter an Order denying Plaintiff's Motion in its entirety;
2. Award Chalese any other relief this Court deems just and appropriate.

DATED this 11th day of January, 2022.

Respectfully Submitted,

//s//Michancy M. Cramer

Michancy M. Cramer, Esq.
Attorney for Defendant

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**
3 **INTRODUCTION**

4 This Court issued a trial management order which included a discovery
5 schedule. Discovery is closed. The Plaintiff has demonstrated for the world to see
6 that he is a vexatious litigant who is going to file and file and file in this case until
7 someone puts a stop to his behavior.
8

9 Nothing the Plaintiff has offered is determinative as to child custody. All
10 the plaintiff seeks to offer the Court is a bunch of messages. Discovery is closed.
11 If the Court allows the Plaintiff to keep discovery open, this is never going to end.
12

13 Plaintiff's motion should be denied. The trial management order was issued
14 and should be followed.
15

16 **II.**
17 **LAW AND ANALYSIS**

18 The trial management order is hereby adopted and incorporated pursuant to
19 EDCR 10(c).
20

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25 **III.**
26 **CONCLUSION**

27 **WHEREFORE**, based upon the foregoing, and for the reasons set forth
28 herein, Chalese respectfully requests that the Court:

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1. Enter an Order denying Plaintiff's Motion in its entirety;
2. Award Chalese any other relief this Court deems just and appropriate.

DATED this 11th day of January, 2022.

Respectfully Submitted,

//s//Michancy M. Cramer

Michancy M. Cramer, Esq.

Attorney for Defendant

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I declare under penalty of perjury, under the law of the State of Nevada, that I served a true and correct copy of *Opposition*, on January 11, 2022, as follows:

- Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D), and Administrative Order 14-2 captioned “*In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court,*” by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system;
- By depositing a copy of same in a sealed envelope in the United States Mail, postage pre-paid, in Las Vegas, Nevada;
- Pursuant to EDCR 7.26, sent via facsimile by duly executed consent for service by electronic means.

To the following address:

Adam Solinger
7290 Sea Anchor Ct
Las Vegas, NV 89131
attorneyadamsolinger@gmail.com
Plaintiff

//s//Michancy M. Cramer

Alex Ghibaudo, P.C.
Attorneys for Defendant

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

Adam Solinger

Plaintiff/Petitioner

vs.

Chelese Solinger

Defendant/Respondent

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

Department: **P**

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

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

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

<input type="checkbox"/>	\$25	The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.
	-OR-	
<input checked="" type="checkbox"/>	\$0	The Motion/Opposition being filed is not subject to the \$25 reopen fee because:
	<input 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 with 10 days after a final judgment or Decree was entered. The final Order was entered on: _____.
	<input checked="" type="checkbox"/>	Other Excluded Motion

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

<input checked="" type="checkbox"/>	\$0	The Motion/Opposition being filed is not subject to the \$129 or \$57 fee because:
	<input checked="" type="checkbox"/>	The Motion/Opposition is being filed in a case not initiated by Joint Petition.
	<input type="checkbox"/>	The party filing the Motion/Opposition previously paid a fee of \$129 or \$57
	-OR-	
<input type="checkbox"/>	\$129	The Motion/Opposition being filed with this form is subject to the \$129 fee because it is a Motion to modify, adjust, or enforce a final Order.
	-OR-	
<input type="checkbox"/>	\$57	The Motion/Opposition being filed 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.

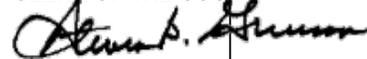
Step 3. Add the filing fees from Step 1 and Step 2:

The total filing fee for the Motion/Opposition I am filing with this form is											
<input checked="" type="checkbox"/>	\$0	<input type="checkbox"/>	\$25	<input type="checkbox"/>	\$57	<input type="checkbox"/>	\$82	<input type="checkbox"/>	\$129	<input type="checkbox"/>	\$154

Party filing Motion/Opposition: **Defendant**

Date: **1-11-22**

Signature of Party or Preparer: *//s//Michancy M. Cramer*



1 **RPLY**
Adam M. Solinger
2 7290 Sea Anchor Ct
Las Vegas, Nevada 89131
3 Tel: (702) 222-4021
Email: attorneyadamsolinger@gmail.com

4 Eighth Judicial District Court
5 Family Division
6 Clark County, Nevada

6 ADAM MICHAEL SOLINGER,) Case No.: D-19-582245-D
7)
7 Plaintiff,) Department: P
8 vs.)
9 CHALESE MARIE SOLINGER,)
10 Defendant.)

11 **REPLY IN SUPPORT OF MOTION TO EXPAND DISCOVERY**
12 **TO INCLUDE UP TO DATE APPCLOSE MESSAGES AND**
13 **OTHER MESSAGES SENT BY THE DEFENDANT**

13 **NOW INTO COURT** comes Plaintiff, ADAM MICHAEL
14 SOLINGER, and hereby submits his reply in support of motion to expand
15 discovery to include updated messages between the parties that were
16 exchanged via the AppClose program, a text message Chalese sent to
17 Adam, and messages sent by Chalese to the mother of Jesse (Josh's son),
18 Delores.

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This reply 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, January 19, 2022.

Respectfully Submitted,

/s/ Adam M. Solinger
Adam M. Solinger

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MEMORANDUM OF POINTS AND AUTHORITIES

I. Introduction

It’s clear that the defense has no real opposition to the instant motion and is instead focusing on attacking Adam. What’s unclear is the standard the defense believes is “determinative as to child custody.”

Additionally, the defense opposition is untimely. So, if extremist adherence to procedure is the only real argument the defense is making, then the opposition should be struck and an order granting the underlying motion should be issued instead.

To be clear, Adam does not actually expect that outcome. Instead, Adam merely believes it ironic that the only real defense argument is based upon a strict adherence to procedure, even if doing so would not be in the best interest of the children in determining child custody, yet the defense’s own position would require striking their opposition.

If nothing else, the conduct of the parties as demonstrated via the AppClose messages and Chalese’s alarming and disturbing messages indicating she was contemplating premeditated homicide certainly have an immeasurable amount of relevance in determining the best interest of the children. Additionally, the defense is disingenuous arguing that Adam is asking for open ended discovery. Indeed, as the underlying motion

1 makes clear, Adam is asking for discovery to only be opened until one
2 week before trial for the limited purposes of using the AppClose messages
3 up until that point and the other messages during the trial, if necessary.

4 **II. LAW AND ARGUMENT**

5 In determining child custody, the sole consideration of the court is
6 the best interest of the child. NRS 125C.0035(1). Under Nevada Supreme
7 Court rule 251, cases that affect custody of minor children must resolve
8 custody within six months of the date that such issues are contested.

9 This case has been pending for over 3 years. It has been continued
10 time and time again with most of the delay attributable to the Defendant.
11 Indeed, this matter was set to have its concluding date of trial in
12 September of 2021. The defendant's unexplained actions necessitated the
13 immediate and emergency withdrawal of her prior counsel and resulted
14 in the matter being continued to November. There the defendant waited
15 until the last minute to hire her current counsels and the matter was again
16 continued to January of 2022.

17 Discovery in this matter closed 30 days prior to the May 10th trial
18 date. Thus, if the current state of discovery is permitted to stand, the Court
19 will not have the benefit of the messages by the defendant via the
20 AppClose program. These messages, as proffered in the original motion,
21 are highly relevant to the issue of child custody. Just one example is in

1 July of 2021 when the defendant abandoned the children with Adam's
2 significant other's daughter. Given that it's unclear what standard of
3 relevance is being used by the defense in declaring that "[n]othing [Adam]
4 has offered us determinative of child custody" Adam cannot make a
5 counter argument. Indeed, the issue of abandonment is directly relevant
6 to the defendant's ability to "adequately care for a minor child for at least
7 146 days of the year." *See* NRS 125C.003(1)(a).

8 Another example is the messages from Chalese to the mother of
9 Josh's child, Delores, wherein she expressed a desire to kill Josh and carve
10 her desire to be treated differently into the bullet she would use to kill him.
11 This would surely be relevant in determining whether an act of domestic
12 violence has occurred or may occur. *See* NRS 125C.003(1)(c).

13 Had this been the first trial setting in this matter, discovery would
14 have remained open until 30 days prior to trial under most standard court
15 discovery schedules. The defense has no real argument and instead relies
16 ironically on strict procedural adherence because the defense knows the
17 uncontroverted messages are harmful and damning. The underlying
18 motion should be granted because it gives the Court the most updated and
19 best information on the children's best interest.

20 **III. ATTEMPT TO RESOLVE PURSUANT TO 5.501**

21

1 This appears to be a common sense request that the defense should
2 have tried to resolve prior to filing their opposition to work towards a
3 resolution. The parties could have certainly come to an agreement on the
4 cutoff date for AppClose messages. Flatly opposing it with no real legal
5 analysis is disingenuous and bordering on frivolous. To add insult to
6 injury, defense counsel declares Adam “has demonstrated for the world to
7 see that he is a vexatious litigant” despite the fact that he has not even
8 been admonished or censured for his filings, despite repeated attempts by
9 every single attorney Chalese has ever hired. While some of Adam’s
10 requests have been denied or deferred for trial, none of the requests have
11 been found to be without merit.

12 If Adam had been litigating this case on behalf of another party,
13 rather than himself, he would surely be entitled to an award of attorney’s
14 fees for responding to this bare opposition that does not even come close
15 to meeting the pleading standards under any colorable interpretation. *See*
16 *EDCR 2.20(i)*¹.

17 **IV. CONCLUSION**

18 Based upon the foregoing, Adam respectfully requests that this
19 Honorable Court permit discovery to be expanded to include the

20 _____
21 ¹ (i) A memorandum of points and authorities that consists of bare citations to statutes, rules, or case
authority does not comply with this rule and the court may decline to consider it. Supplemental briefs will only
be permitted if filed within the original time limitations of paragraphs (d), (e), or (g), or by order of the court.

1 AppClose messages between the parties from the prior close of discovery
2 to one week before trial, to allow admission of the text message Chalese
3 sent asking how to obtain an emergency restraining order, and to allow
4 Chalese to be questioned on her text messages that she sent to Delores.

5 Dated Wednesday, January 19, 2022.

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7 Respectfully Submitted:

8 /s/ Adam M. Solinger
9 Adam M. Solinger

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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 **REPLY IN SUPPORT OF MOTION TO EXPAND DISCOVERY TO INCLUDE UP TO DATE APPCLOSE MESSAGES AND OTHER MESSAGES SENT BY THE DEFENDANT**

3. I have read said *reply* 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 Wednesday, January 19, 2022.

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **REPLY IN SUPPORT OF MOTION TO EXPAND DISCOVERY TO INCLUDE UP TO DATE APPCLOSE MESSAGES AND OTHER MESSAGES SENT BY THE DEFENDANT**

was filed electronically with the Eighth Judicial District Court in the above-entitled manner, on January 19, 2022. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Alex Ghibaudo, Esq.
Michancy M. Cramer, Esq.
Attorneys for Defendant

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER