

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

3 HERMAN WILLIAMS,

4 Appellant,

5 vs.

6 NADINE WILLIAMS,

7 Respondent.

No.: 83263

APPELLANT'S APPENDIX
Volume 3

Electronically Filed
Feb 26 2022 10:48 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

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TRANS

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

NADINE ALECIA WILLIAMS,)
Plaintiff,)
vs.)
HERMAN GEORGE WILLIAMS,)
Defendant.)

CASE NO. D-16-586291-D
DEPT. I
APPEAL NO. 83263
(SEALED)

BEFORE THE HONORABLE DIANE STEEL
DISTRICT COURT JUDGE

TRANSCRIPT RE: ALL PENDING MOTIONS

MONDAY, DECEMBER 16, 2019

APPEARANCES:

The Plaintiff:
For the Plaintiff:

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The Defendant:
For the Defendant:

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1 LAS VEGAS, NEVADA

MONDAY, DECEMBER 16, 2019

2 P R O C E E D I N G S

3 (THE PROCEEDINGS BEGAN AT 09:26:03)

4

5 THE COURT: Okay. On the Williams matter, this is
6 case number 586291. Can I have appearances?

7 MR. TOTI: Your Honor, Frank Toti, bar number 5804,
8 here with the Plaintiff.

9 MR. ROBBINS: Kenneth Robbins, bar number 13572,
10 with Herman Williams.

11 THE COURT: Thank you. I'm appearing on behalf of
12 Judge Moss under Supreme Court order. She wasn't able to be
13 here today, and I'm just a senior temporary judge on the
14 matter. I'm not here to change anything or to act as her
15 appellate judge for anything she may have already done. Can
16 we proceed?

17 MR. TOTI: Yes.

18 MR. ROBBINS: This is Defendant's motion.

19 MR. TOTI: Yes.

20 THE COURT: Go ahead.

21 MR. ROBBINS: So there's a previous order that the
22 children are supposed to be in Dad's care. Mom has visitation
23 on Saturday, daytime visitation only. And that's due to -- as
24 a result of a previous CPS case, where Mom was found to have

1 endangered the children.

2 THE COURT: Did that case go to any formal
3 proceeding?

4 (COUNSEL AND DEFENDANT CONFER BRIEFLY)

5 MR. ROBBINS: Yes.

6 THE COURT: I can't find one in the system.

7 MR. TOTI: It did not.

8 (COUNSEL AND DEFENDANT CONFER BRIEFLY)

9 MR. ROBBINS: And just so you know, I'm new to this
10 case. I just came in --

11 THE COURT: Me, too.

12 MR. ROBBINS: -- on it. So some of the previous
13 facts aren't known to me. I believe there is a report,
14 however, where Mom was found to hit the children with a pipe.

15 THE COURT: Well, but they didn't proceed on it.
16 But for some reason, we're all following the direction of some
17 little person who graduated with a bachelor's degree in social
18 work. I -- I always find that to be really odd. Go ahead.

19 MR. ROBBINS: So Mom also has a holiday schedule,
20 and during the Nevada Day visit, which was obviously in -- at
21 the end of October, Dad brought the children to Mom, and then
22 Mom kept the -- their daughter, Abigail. She's had Abigail
23 since that October -- late October visit for Nevada Day, and
24 has refused to return the children -- the child back to Dad.

1 Dad still has the boys, but she -- she refuses to bring the --
2 Abigail back to Dad.

3 THE COURT: What was interesting when I read through
4 the FMC report, Abigail didn't want to live with her mother.

5 MR. ROBBINS: Correct. And then now they're making
6 a claim that Dad's been abusive, and that CPS is informing
7 them to keep Abigail.

8 THE COURT: How can they do that? Okay.

9 MR. ROBBINS: I don't know. And that's why we're
10 here.

11 THE COURT: Uh-huh. And they didn't open up a case.

12 MR. ROBBINS: Right. So it -- it's their claim in
13 their opposition that CPS informed her don't return the child
14 to Dad, violate -- which is clearly in violation of the
15 Court's orders, which CPS usually does not tell parties to
16 violate court orders. They would tell you if there's an
17 issue, you need to file something with the Court --

18 THE COURT: Or they may do something if there's no
19 court --

20 MR. ROBBINS: -- and ask for something to be changed
21 --

22 THE COURT: -- yet, but --

23 MR. ROBBINS: Right. So we -- we find it hard to
24 believe that that's really what is happening.

1 THE COURT: Uh-huh.

2 MR. ROBBINS: So Dad would like the child returned
3 to his care immediately. In addition, there is the issue of
4 the tow truck. So Dad's a tow truck driver. He has the truck
5 in his possession. However -- and -- that was -- a -- an
6 order that is deferred until trial, that Dad will keep the
7 truck.

8 THE COURT: Uh-huh.

9 MR. ROBBINS: However, he recently found out when he
10 got pulled over, and found out that the registration was
11 cancelled by Mom.

12 THE COURT: Uh-huh.

13 MR. ROBBINS: As such, he is not able to work, and
14 not able to -- to make a living to sustain himself and care
15 for these children, because he's not able to -- to work as a
16 tow truck driver. And they want to say, well, he has another
17 truck that -- that can do the job, but that's not true. He
18 does have another truck.

19 However, that truck can't be used to tow. If --
20 when it is used to tow, it can create dents in the -- in the
21 vehicles that -- that he's towing. So it -- we need this
22 registration to be renewed immediately, and apparently, she
23 had cancelled the registration way back in July. And we came
24 to court -- or they came to court, I wasn't here, but they

1 came to court subsequent to that, and didn't make -- she
2 didn't make any mention that, oh, by the way, yeah, you can
3 have the car, you're going to have the car, but there's no
4 registration on it. And she -- and he believes that she did
5 this strictly to be malicious towards him so that he wouldn't
6 be able to work.

7 He's not able to register the vehicle on his own
8 because it's -- it's in her name alone. So we need her to
9 cooperate to get this truck re-registered immediately so that
10 he can go back to work. Right now, he's not able to work at
11 all.

12 THE COURT: Can't he do it on his own, re-register
13 it?

14 MR. ROBBINS: He can't.

15 THE COURT: Why not?

16 MR. ROBBINS: He can't. Because it's not in his
17 name.

18 THE COURT: Ah.

19 MR. ROBBINS: It's in her name alone.

20 THE COURT: Funny, the things we do when we're in
21 love, when we still trust each other.

22 MR. ROBBINS: And he filed his motion on his own,
23 obviously, and I understand there's some issues in regards to
24 being able to find her in contempt, based on his pleadings,

1 but at least we would like these orders enforced. One other
2 thing, sorry, the Judge had ordered that they use the AppClose
3 app, which it doesn't work on Dad's phone. He's tried to
4 download the app, and he can download it, but he can't send
5 any messages or receive any messages.

6 She still texts him, though on the regular phone.
7 So any statements by her that, well, I couldn't comply with
8 sending him pictures or anything else is simply false, because
9 she still texts him using just regular texts, that anyone
10 would use, outside of the app. So, you know, if -- I would
11 suggest they sign up for a different program possibly, that
12 maybe is compatible with his phone. But the AppClose app that
13 Judge Moss had ordered doesn't work.

14 THE COURT: Okay.

15 MR. ROBBINS: Thank you.

16 THE COURT: All right. I have a bunch of Unity CPS
17 notes and records up here, by the way, in case you see me
18 thumbing through. And it seems to be from a previous
19 something that was going on. I'm not seeing any case opened
20 ever, and I'm not seeing that anything is currently. But
21 maybe you guys could take a look at it.

22 MR. TOTI: Your Honor, with regard to --

23 THE COURT: Did you guys get a copy of this? No?

24 MR. ROBBINS: We have not.

1 THE COURT: Okay.
2 MR. TOTI: With regard to the oldest child, Your
3 Honor, in this case Judge Moss has made clear previously that
4 based on the age of the child, the -- and some of the facts
5 and circumstances that have come out in this case, the Judge
6 was going to defer to that child with regards to --

7 THE COURT: Why didn't she put that in her order?

8 MR. TOTI: I'm not sure, Judge. But there was a
9 child interview --

10 THE COURT: Uh-huh.

11 MR. TOTI: -- and there --

12 THE COURT: And she adamantly did not want to live
13 with her mom.

14 MR. TOTI: Correct.

15 THE COURT: So that's what I'm looking at.

16 MR. TOTI: That's correct, Judge. And then also,
17 there was supposed to be counseling between my client and the
18 child. Now, that took several months to coordinate and
19 schedule. Basically, Defendant just would not contact the
20 counselor or anything of that nature. That was finally
21 scheduled. However, by the time that happened, the child has
22 now returned to my client, and specifically wants to stay with
23 my client.

24 THE COURT: When did that happen?

1 MR. TOTI: That happened in mid-October, Judge.

2 THE COURT: So in mid-October, did your client file

3 a motion to resolve this issue before he dragged her into

4 court for a contempt order?

5 MR. TOTI: She did not, Judge. What happened

6 instead is, again, and Your Honor made the comment a moment

7 ago, but yes, Judge, sometimes the tail wags the dog, in that

8 CPS does have the authority and the ability to say, we're not

9 having any contact. Now, this does --

10 THE COURT: Well, we're going to open a case. So

11 then --

12 MR. TOTI: Well, that's --

13 THE COURT: -- you can't violate a judge's order if

14 a -- if a worker has told you to do something without filing a

15 motion to get back to the judge immediately.

16 MR. TOTI: Well, and the problem, Judge, is is that

17 as Your Honor is aware, CPS has now changed their policy,

18 whereas if there is one, quote, unquote, fit parent, they're

19 not going to open an active case.

20 THE COURT: That's fine.

21 MR. TOTI: And I -- I understand.

22 THE COURT: Yeah.

23 MR. TOTI: So --

24 THE COURT: I don't have a problem with that.

1 MR. TOTI: -- so that's where we are now.

2 THE COURT: But they can't tell the Court what to
3 do.

4 MR. TOTI: Correct.

5 THE COURT: And that's what they're doing when they
6 --

7 MR. TOTI: And I realize that. I've come up against
8 it several times in the last couple of years, and all I can
9 say is, is that -- that just continually is what they're
10 doing, and that's what their policy has been now, so.

11 THE COURT: Okay.

12 MR. TOTI: With regard to that, Judge, what we're
13 looking to do is we are looking -- it -- I -- I believe --
14 Judge Moss isn't here, I know you're not standing in her
15 shoes, so to speak --

16 THE COURT: Right.

17 MR. TOTI: -- what -- Judge Moss had no problem
18 basically saying to the Court -- or saying to the parties,
19 here's what we're going to do. We're going to have visitation
20 between the children and Mom. It's going to be for a couple
21 of hours on Saturday, let the kids get comfortable, things of
22 that nature.

23 And specifically, because of the daughter's age, the
24 daughter was kind of quasi having to go, but not really going

1 to be forced to go. So now the situation has flipped. We
2 would ask for a new child interview of all the children so we
3 can get a better idea of what's going on now, what's changed.
4 I mean, obviously, there is a significant change, and that
5 happened about a month-and-a-half ago. So what we'd be
6 looking for --

7 THE COURT: What are you basing a significant change
8 on? Just the daughter not going back?

9 MR. TOTI: The daughter is now saying she wants to
10 spend --

11 THE COURT: Did something happen?

12 MR. TOTI: That's what the child has alleged to my
13 client, and as a result of that, she -- I -- we would think
14 another child interview would be most insightful to the Court.

15 THE COURT: Uh-huh.

16 MR. TOTI: I would also ask that with regards to
17 their daughter, and their daughter only, that the order
18 pending trial be teen discretion. Okay? Again, this is
19 something that Judge Moss basically was giving the child to
20 begin with. I don't think anybody anticipated that it would
21 be a complete 180 flip, but nonetheless, we would ask for that
22 same order that was basically previously provided to the
23 Defendant.

24 Judge, with -- now, towards that end, we have this

1 in our motion, and I would imagine, Judge, that a majority of
2 this will just have to wait for the time of trial, where this
3 all started was that my client had her visitation on Saturday.
4 The judge put in the standard holiday schedule, the standard
5 holiday schedule included a whole weekend for Nevada -- for
6 the Nevada Day holiday. Defendant was refusing to allow that
7 to -- to happen --

8 THE COURT: Because the Judge clearly said no
9 overnights.

10 MR. TOTI: Well, but she also just put in --

11 THE COURT: In the order, she said it, whether she
12 said it out loud on the bench.

13 MR. TOTI: What she did -- again, Judge, she gave --
14 she gave my client a specified visitation --

15 THE COURT: And a holiday plan.

16 MR. TOTI: And a holiday plan. And --

17 THE COURT: Uh-huh.

18 MR. TOTI: So we were just following the schedule.
19 I -- I appreciate that argument, but that was something that
20 could have been brought to the court. Regardless, okay, that
21 is about the time when everything changed. The child has made
22 several things -- said -- made several comments to my client.
23 They were in my opposition and countermotion.

24 And it -- it's troubling if true, and obviously CPS

1 had something to do with this, as well, and believed the child
2 to some extent, because that was when the CPS worker said,
3 don't put the child back in Dad's care, until -- until further
4 ordered. So that's basically where we are with this whole
5 idea or notion regarding contempt and visitation. We have a
6 teen child that is basically saying, I want to act as I
7 please. And again --

8 THE COURT: That never happens.

9 MR. TOTI: -- I'm not sure if that's -- well, and I
10 get that, Judge. And -- and -- and like I said, Judge Moss
11 has routinely been, and in -- in this case, has routinely
12 empowered children around this child's age to have a
13 significant say in what kind of contact and visitation she'll
14 have with both parents. So that's what we're looking for.

15 Your Honor, with regard to the truck, before the
16 parties came to court, my client was attempting to retrieve
17 the truck from the Defendant. He refused to give it to her.
18 So as a result of that, she did cancel the registration. It
19 was before we were in court. The order of the Court was
20 Defendant can keep the truck, pending trial --

21 THE COURT: Does she need it for transportation?

22 MR. TOTI: She cannot afford to live and to pay this
23 truck, and to also have to pay for another vehicle.

24 THE COURT: But now that he doesn't have a job

1 because she took the truck, he can't pay for it, either?

2 MR. TOTI: He -- he has a job, Judge. He has a job,
3 and he's working --

4 THE COURT: Does he need that truck?

5 MR. TOTI: That's what they are alleging, but we
6 believe that he does not, and we believe that he has another
7 vehicle --

8 THE COURT: So you want to roll the dice on him
9 having the money?

10 MR. TOTI: What I would say, Judge, at the very
11 least is if that -- I mean, this is obviously -- it's a
12 community asset. We don't --

13 THE COURT: Yeah.

14 MR. TOTI: -- have an issue there. If -- if -- if
15 the Defendant wants to utilize the truck pending trial, then
16 he can register the vehicle. We'll provide the information.
17 He can register the vehicle, and he can pay for the vehicle.
18 If he wants to utilize it, he should have to pay for it is the
19 argument.

20 THE COURT: Uh-huh.

21 MR. TOTI: And then, Judge, with regards to the
22 parenting app, I mean, we've been through this for months and
23 months and months. My client finally did say to the
24 Defendant, okay, fine, let's not use the AppClose app, let's

1 use TalkingParents. She sent him that information, as well.
2 He has not signed up for TalkingParents. So there is a
3 TalkingParents invite pending for the Defendant. He hasn't
4 signed up for that, either.

5 THE COURT: Because he's waiting for the Judge to
6 say something.

7 MR. TOTI: I suppose --

8 THE COURT: He's going by the Judge technical stuff,
9 and --

10 MR. TOTI: I get that.

11 THE COURT: -- she's going by the life experience
12 things.

13 MR. TOTI: I get that. But again, for months and
14 months and months, we're being told -- and -- and this goes
15 back to March, Judge. This doesn't even go back to the August
16 hearing. This goes back to the previous hearing where the
17 judge said, utilize AppClose. We're talking about nine
18 months, and Defendant hasn't done anything towards that.

19 THE COURT: And she hasn't called him on the carpet
20 in front of the Judge, either.

21 MR. TOTI: Well, she did --

22 THE COURT: Because they don't know what to do.

23 MR. TOTI: She did in the August hearing.

24 THE COURT: They're on their own.

1 MR. TOTI: Yeah. She did in the August hearing,
2 Judge, and that was when the Court reiterated that he had to
3 sign up for it immediately, and he still hasn't done it. So
4 again, if the argument, and I've never heard this up until
5 now, but okay. If Defendant has this special phone, this one
6 in a million phone that doesn't allow AppClose to work on his
7 phone, that's fine. But my client also sent TalkingParents.
8 We would ask that immediately sign up and accept the invite on
9 TalkingParents, Judge.

10 THE COURT: Okay. That it?

11 MR. TOTI: That's it, Judge.

12 THE COURT: Any re --

13 MR. ROBBINS: Yeah, just a couple things. As far as
14 any delay in the therapist, Mom had provided information to
15 Dad how to contact the therapist, and she gave him the wrong
16 information.

17 (COUNSEL AND DEFENDANT CONFER BRIEFLY)

18 MR. ROBBINS: Oh, sorry. She gave the therapist the
19 wrong information on how to contact Dad. So that was the
20 reason -- that was the reason for a delay.

21 As far as having the child re-interviewed or just
22 giving this 15 year old broad discretion to say, I want to be
23 wherever I want to be, I mean, since the end of October, Dad
24 hasn't even had phone contact with the child. And I highly

1 doubt it's the child saying, I just don't want anything to do
2 with Dad all of a sudden, now that I've been with Mom and she
3 refused to -- to return the child.

4 THE COURT: This was the child that was hit?

5 MR. ROBBINS: Right. Dad has had no contact
6 whatsoever. And so now, two months nearly have gone by where
7 the child's been exclusively in Mom's care, which Mom
8 obviously has issues with Dad, and who knows what she's
9 filling the child's head with about Dad. And the -- so now
10 we're supposed to re-interview her after two months where
11 she's had 100 percent of the time?

12 And so we object to having her re-interviewed. We
13 wish that the order be maintained, that the child be returned
14 to Dad immediately, and that her day time visitation be kept
15 intact.

16 As far as the vehicle goes, there's only four months
17 left on the loan of the vehicle. Dad can take over the
18 payment, but we need Mom's cooperation to register the
19 vehicle. He is not able to register the vehicle on his own.
20 He tried. He went to the DMV and tried to have the vehicle
21 registered --

22 THE COURT: Okay.

23 MR. ROBBINS: -- again, so that he can work. He --
24 he's not able to work --

1 THE COURT: Got it.

2 MR. ROBBINS: -- without it.

3 THE COURT: All right. Here's where we are. I'm
4 going to phrase my statements carefully so that I can really
5 capture what's going on, and maybe get your attention as
6 parents. You can spend hundreds of thousands of dollars going
7 with the technicality of an order, instead of the spirit of
8 the order.

9 I think there comes a time where you put on your I'm
10 a regular person hat and say, okay, this is what needs to be
11 done. The TalkingParents -- and I don't ever order any of
12 that stuff, but since Judge Moss did order it, I'm not going
13 to rescind it. But I will say that you try the TalkingParents
14 if the other one doesn't work. Give that a try. Unless you
15 have a flip phone that doesn't do anything. If you've got a
16 smart phone, figure out how to get that done. That's number
17 one.

18 Number two, I was very, when I was trying to read
19 what was going on here, disturbed that Mother was keeping the
20 child overnights and Judge Moss said no. And then she didn't
21 file anything, made him come to court. So -- and I know that
22 that's just a I don't know what to do situation, and I don't
23 want to run into court and look like a crybaby all the time,
24 because then the Judge will get mad at me. Don't worry about

1 that. The Judge orders something, and you can't comply, or
2 you feel like it's now become inappropriate, you need to get
3 back to court. Okay?

4 The two of you have four children, and a long
5 lifetime together. And you really shouldn't be in this war
6 mode. You really should just see where the paths are going,
7 and be amicable about it in respect for the long life that you
8 have had together, and see if you can't get this thing
9 settled. It's kind of counterproductive to beat each other
10 into the ground, and then expect the children to respect both
11 of you.

12 Because they're going to pick a team. That's what
13 they do. And then eventually, Mom is going to let her have
14 her driver's permit, and you're not, so she's going to want to
15 be with Mom. And then you're going to say, well, she can
16 drive, I'm going to give her a car, and then she's going to
17 want to be with Dad.

18 And then Mom's going to say, well, I want her to go
19 to the prom and you don't want her to go with this particular
20 boy, and now -- and the -- and the child's in charge already.
21 She's already deciding how to get what she wants with the
22 parent who will give it to her for whatever reason. And
23 that's what you guys are confronting.

24 Now, if you keep along this same line, you've got a

1 teenaged girl out there who's going to start doing things you
2 don't want her to do. You're going to have that, because
3 she's going to be holding you both hostage. So be very, very
4 cognizant of this age time frame.

5 I'm comfortable doing the teen discretion, but -- as
6 long as -- between now and trial. But she needs to make some
7 contact with Dad. No, I'm just saying she needs to. Even if
8 it's just by phone. You need to -- she needs to do that.
9 You're the mom. Huh?

10 THE PLAINTIFF: I've -- I've -- she has her phone,
11 and she has her dad's number, and I've asked her on multiple
12 occasions --

13 THE COURT: Tell her that the Judge said to.

14 THE PLAINTIFF: Okay.

15 MR. TOTI: I'll -- I'll explain it to you.

16 THE COURT: He'll talk to you about it later on.
17 Just say hi, good morning. I'm not asking you -- that you and
18 your daughter get into it on the phone. I'm just -- how are
19 you doing, baby, that kind of thing. All right? Until you
20 get back to court. I --

21 MR. TOTI: And, Judge, towards that end, with
22 regards to the idea of parenting and things of that nature,
23 obviously, the overwhelming majority of the child's items are
24 at Dad's residence.

1 THE COURT: Yeah, they're going to stay there.
2 MR. TOTI: Okay. Okay.
3 THE COURT: They're going to stay there.
4 MR. TOTI: Understood, Judge.
5 THE COURT: He has custody. If she needs an item or
6 two, she can come and get it and then bring it back, but I'm
7 not wholesale moving the child --
8 MR. TOTI: I was --
9 THE COURT: -- between now and trial.
10 MR. TOTI: Understood, Judge.
11 THE COURT: To the extent that there are contempt
12 matters in front of us today, where one of you has violated a
13 court order, technically or otherwise, because you thought
14 that was what it said, I'm going to continue that over to the
15 trial where we would actually be taking testimony. So if you
16 guys don't resolve this between now and then, that will be on
17 the table, and you'll need to bring your evidence along those
18 lines. We haven't run out discovery time yet, I take it?
19 MR. TOTI: I think we have, Judge.
20 THE COURT: When does discovery end?
21 MR. TOTI: Let me look at the schedule.
22 THE COURT: Is there like a trial motion or
23 something here --
24 MR. TOTI: That's what I'm --

1 THE COURT: -- that she --
2 MR. TOTI: -- I'm looking for now, Judge.
3 THE COURT: Okay.
4 MR. TOTI: The discovery closes January 6th.
5 THE COURT: So you still have some time. I'm
6 willing to even -- is that a Monday, or that's a Friday. So
7 I'm willing to put it out one more week, just to make sure
8 that you can capture everything.
9 With regard to the car, ma'am, you undid it, you
10 need to fix that, and put it back into -- into working order.
11 And you need to make the payments on it. If you need it for
12 your job, you need to make the payments on it. She can't
13 afford to do that. Or the -- it's all going to be foreclosed
14 on, you guys are going to lose everything. So is the car
15 upside down right now?
16 THE PLAINTIFF: No, I have been making the payments,
17 Your Honor.
18 THE COURT: Okay.
19 THE PLAINTIFF: It's just that my current vehicle is
20 upside down.
21 THE COURT: Your what?
22 THE PLAINTIFF: My current vehicle is upside down.
23 THE COURT: That's okay.
24 MR. TOTI: That's why I said she couldn't afford

1 both, Judge, so.

2 THE COURT: I understand.

3 MR. TOTI: We will provide the ability for the

4 Defendant to pay for the registration and then pay for the

5 vehicle --

6 THE COURT: Right.

7 MR. TOTI: -- between now and trial.

8 THE COURT: Did you hear that? Because your client

9 was talking to you.

10 MR. ROBBINS: Sorry.

11 THE COURT: He's going to make provision so that he

12 can register the vehicle, get it paid for, and continue making

13 the payments until trial. It's only a couple of months, so it

14 shouldn't be any big thing. I don't see any child support --

15 MR. TOTI: Nothing was ordered --

16 THE COURT: -- award here yet.

17 MR. TOTI: -- Judge.

18 THE COURT: I don't see a lot of stuff. I see huge

19 expenses and no income. I don't see either one of you making

20 the kind of dollars that would cover even your expenses. So

21 you're going to have to really slide back on your lifestyle a

22 little bit, because can't keep you going there. How long have

23 you guys been married?

24 THE DEFENDANT: Fifteen years.

1 THE COURT: Okay. Is there a request for spousal
2 support in this action?

3 MR. TOTI: I don't believe so.

4 THE COURT: Okay.

5 MR. ROBBINS: Yes.

6 THE COURT: There is? She's requesting you to pay
7 spousal --

8 MR. ROBBINS: He said --

9 THE COURT: -- support? You're requesting her to
10 pay you spousal support? Does she make more money than you?

11 THE DEFENDANT: Yes.

12 THE COURT: Okay. Oh, no. I guess I was looking at
13 the wrong thing. I see here there's a gross monthly income
14 big and little to Mom, and nothing to Dad. Okay. Because he
15 -- you don't have a job? You got fired?

16 THE DEFENDANT: No, I --

17 MR. ROBBINS: Right now, he's --

18 THE DEFENDANT: -- do subcontracting work for
19 Copart. If I don't work, I don't get paid. I get paid by the
20 cars. So every zone is different.

21 THE COURT: I see. All right. Well, work that --
22 you got a couple of months. I'm not going to be making any
23 changes in -- in support at this point in time. You've got
24 until February -- the 22nd? January -- end of January?

1 MR. TOTI: It's early February, Judge.
2 THE COURT: Early February? Okay.
3 MR. ROBBINS: (Indiscernible).
4 THE CLERK: February 4th is their trial.
5 THE COURT: January 22nd is the --
6 MR. TOTI: Calendar call.
7 THE COURT: -- calendar call.
8 THE CLERK: Yeah. That's --
9 THE COURT: You've got 30 days, really, technically.
10 30 -- five weeks before you guys are going to go to trial.
11 Unless CPS opens a case. If they do, then there
12 will be a stay of everything. I'm going to leave the trial
13 where it is at this juncture, because I think the sooner you
14 guys are able to resolve this, the better. You have two
15 attorneys who know basically how these things play out. They
16 know the judge that's going to making this final determination
17 call. It would probably benefit you guys tremendously to meet
18 somehow and make some accommodations and stipulations, such if
19 you get to the custody and the divorce action, actually to
20 resolve it. But failing that, then you guys are going to be
21 stuck with attorney fees.
22 It looks like, before you lost your job, so to
23 speak, the ability to do a job, whichever, however you want to
24 capture it, what was your monthly income?

1 THE DEFENDANT: 4,000.
2 THE COURT: Okay. And then would you be able to
3 resume that once you get the registration back?
4 THE DEFENDANT: I was making 15 to 1600 a week.
5 THE COURT: Okay.
6 THE DEFENDANT: It dropped to 1,000, 900 --
7 THE COURT: Uh-huh.
8 THE DEFENDANT: -- because I can't tow -- like, they
9 give you --
10 THE COURT: I get it.
11 THE DEFENDANT: -- crash cars, I can pick up with
12 that truck.
13 THE DEFENDANT: Cars that's not hit at all --
14 THE COURT: Uh-huh.
15 THE DEFENDANT: -- I can't pick up with that truck.
16 I'm ruining the bumpers. I got --
17 THE COURT: Got it.
18 THE DEFENDANT: -- (indiscernible) for 2019 the
19 other day.
20 THE COURT: I understand. Got it.
21 THE DEFENDANT: Because I messed up.
22 THE COURT: Okay. So I'm going to step back just
23 one order, Mr. Toti. I want her to pay for the registration.
24 MR. TOTI: Okay.

1 THE COURT: She cancelled it, she can pay for it.
2 But he'll pay for the truck. Okay? Did I cover everything?

3 MR. TOTI: Yes, Judge.

4 (COUNSEL AND DEFENDANT CONFER BRIEFLY)

5 (COURT AND CLERK CONFER BRIEFLY)

6 THE COURT: If you could settle this, it's probably
7 in your financial best interests, because then you don't have
8 that day or two of trial that you may be facing at however
9 many dollars an hour that's going to cost you, so work on
10 that.

11 MR. TOTI: Thank you, Judge.

12 MR. ROBBINS: And, Your Honor --

13 THE COURT: I would say this, and I don't know if
14 Judge Moss has already said it, but 10 years of marriage,
15 we're looking at a spousal support legitimate request. So put
16 that in the hopper, as you guys do your negotiations.

17 MR. ROBBINS: Can we get a date of when this truck
18 should be registered by?

19 THE COURT: How soon do you think you can get it
20 done? Two weeks?

21 THE PLAINTIFF: Two weeks.

22 THE COURT: Two weeks. No? He -- he's not working
23 the whole time you're not doing it.

24 THE PLAINTIFF: He's not -- he's not being truthful,

1 Your Honor. He's --

2 THE COURT: Well, ma'am, that'll come up at trial.

3 THE PLAINTIFF: I can't afford to register it until

4 the next two weeks.

5 THE COURT: He has zero income.

6 THE PLAINTIFF: Your Honor, I -- I really can't --

7 THE COURT: You need to prove that in court whenever

8 it comes, yeah.

9 THE PLAINTIFF: I -- I can't --

10 THE COURT: Hold on.

11 MR. ROBBINS: If it's -- if it's a matter of not

12 wanting to pay for it, he'll pay for the registration. He

13 just needs it done immediately.

14 THE COURT: Okay. He'll do it immediately.

15 MR. ROBBINS: But we need her to --

16 THE COURT: We'll look at whether or not she has to

17 reimburse him.

18 MR. TOTI: Your Honor, we'll -- we'll get all that

19 information, we'll get them the -- the -- the price, and then

20 they can pay --

21 THE COURT: All right.

22 MR. TOTI: -- and we get it registered immediately.

23 THE COURT: Okay. You both have counsel. Are you

24 unbundled?

1 MR. ROBBINS: I'm retained for the trial.
2 THE COURT: Retained for trial. And you're
3 retained?
4 MR. TOTI: Yes, Judge.
5 THE COURT: You guys see if you can grind this to
6 get these people --
7 MR. TOTI: Sure.
8 THE COURT: -- amic -- as easily as possible out of
9 this circumstance.
10 MR. TOTI: Thank you, Your Honor.
11 MR. ROBBINS: So can we have it registered by this
12 weekend?
13 THE COURT: He's going to register it, so yes.
14 MR. ROBBINS: But he can't register --
15 MR. TOTI: Judge, we will go to the DMV --
16 THE COURT: Yes, by Friday --
17 MR. TOTI: We'll do all of that, yes.
18 THE COURT: By Friday. Today's Monday. By
19 Wednesday, get him all the stuff he needs.
20 MR. TOTI: Of course, Judge.
21 THE COURT: Okay.
22 MR. ROBBINS: He can't go there and do it himself.
23 He's tried.
24 THE COURT: By Wednesday.

1 MR. ROBBINS: Yeah.
2 THE COURT: They're going to make the arrangements.
3 MR. ROBBINS: Okay.
4 MR. TOTI: Thank you, Judge.
5 THE COURT: All right? That gives you two days.

6 (PROCEEDINGS CONCLUDED AT 9:54:49)
7
8

9 * * * * *
10 ATTEST: I do hereby certify that I have truly and
11 correctly transcribed the digital proceedings in the
12 above-entitled case to the best of my ability.
13

14 /s/ Nita Painter
15 Nita Painter
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23
24

FDF

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Nevada State Bar No. 005804

Electronically Filed
1/3/2020 10:46 AM
Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

Eighth Judicial District Court
Clark County, Nevada

<u>NADINE WILLIAMS</u> Plaintiff,	Case No. <u>D-19-586291-D</u>
vs. <u>Herman Williams jr</u> Defendant.	Dept. <u>I</u>

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (first, middle, last) Nadine alecia williams
2. How old are you? 37
3. What is your date of birth? 11.21.1982
4. What is your highest level of education? Masters degree in nursing

B. Employment Information:

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

☐ No

☒ Yes If yes, complete the table below. Attached an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
10.15.15	Advanced health care	Registered nurse	Mon through fri	Varies

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: _____ Date of Hire: _____ Date of Termination: _____
Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 12 23 2019 my gross year to date pay is 159265.55.

B. Determine your Gross Monthly Income.

Hourly Wage

	×		=	\$0.00	×	52	=	\$0.00	÷	12	=	\$0.00
Hourly Wage		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Months		Gross Monthly Income

Annual Salary

\$159,265.55	÷	12	=	\$13,272.10
Annual Income		Months		Gross Monthly Income

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support			
Workman's Compensation			
Other:			
Total Average Other Income Received			\$0.00

Total Average Gross Monthly Income (add totals from B and C above)	\$13,272.10
--	-------------

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	0.00
2.	Federal Health Savings Plan	0.00
3.	Federal Income Tax	922.89
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): \$922.89	922.89
5.	Life, Disability, or Other Insurance Premiums	0.00
6.	Medicare	149.07
7.	Retirement, Pension, IRA, or 401(k)	0.00
8.	Savings	0.00
9.	Social Security	112.74
10.	Union Dues	0.00
11.	Other: (Type of Deduction)	0.00
Total Monthly Deductions (Lines 1-11)		2,107.59

Business/Self-Employment Income & Expense Schedule**A. Business Income:**




What is your average gross (pre-tax) monthly income/revenue from self-employment or businesses?
\$ 0.00

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			0.00

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 	Other Party 	For Both 
Alimony/Spousal Support	0.00			
Auto Insurance	310.67			✓
Car Loan/Lease Payment	1,141.12	✓		
Cell Phone	313.94	✓		✓
Child Support (not deducted from pay)	0.00	✓		
Clothing, Shoes, Etc...	150.00	✓		
Credit Card Payments (minimum due)	1,850.00			
Dry Cleaning	15.00			
Electric	100.00			
Food (groceries & restaurants)	800.00			
Fuel	600.00	✓		
Gas (for home)	75.00	✓		
Health Insurance (not deducted from pay)	45.00	✓		
HOA	0.00	✓		
Home Insurance (if not included in mortgage)	0.00	✓		
Home Phone	188.00	✓		
Internet/Cable	0.00			
Lawn Care	0.00			
Membership Fees	10.00			
Mortgage/Rent/Lease	1,288.00			
Pest Control	0.00			
Pets	100.00			
Pool Service	0.00			
Property Taxes (if not included in mortgage)	0.00			
Security	0.00			
Sewer	0.00			
Student Loans	690.00			
Unreimbursed Medical Expense	900.00			
Water	45.00	✓		
Other: Lease payments	1,385.00	✓		
Total Monthly Expenses	10,006.73			

Household Information

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

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	Abigail Williams	10.27.04	Self	Yes	No
2 nd					
3 rd					
4 th					

- 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	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone				
Child Care				
Clothing	200.00			
Education				
Entertainment	150.00			
Extracurricular & Sports	100.00			
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation				
Unreimbursed Medical Expenses				
Vehicle				
Other: Transportation	50.00			
Total Monthly Expenses	500.00	0.00	0.00	0.00

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

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
Stephen Joyner	36	Friend	\$ 300.00

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.	Chevy Silverado 2015	\$ 29,800.00	-	\$ 1,650.00	=	\$ 28,150.00	Nadine
2.	Chevy traverse	\$ 34,500.00	-	\$ 35,654.56	=	\$ -1,154.56	Nadine
3.		\$	-	\$	=	\$ 0.00	
4.		\$	-	\$	=	\$ 0.00	
5.		\$	-	\$	=	\$ 0.00	
6.		\$	-	\$	=	\$ 0.00	
7.		\$	-	\$	=	\$ 0.00	
8.		\$	-	\$	=	\$ 0.00	
9.		\$	-	\$	=	\$ 0.00	
10.		\$	-	\$	=	\$ 0.00	
11.		\$	-	\$	=	\$ 0.00	
12.		\$	-	\$	=	\$ 0.00	
13.		\$	-	\$	=	\$ 0.00	
14.		\$	-	\$	=	\$ 0.00	
15.		\$	-	\$	=	\$ 0.00	
Total Value of Assets (add lines 1-15)		\$ 64,300.00	-	\$ 37,304.56	=	\$ 26,995.44	

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.	Irs	\$ 6,114.23	Both
2.	First premier	\$ 881.11	Self
3.	Jetblue	\$ 3,345.06	Self
4.	Capital one	\$ 3,461.45	Self
5.	Freedom financial	\$ 26,835.62	Self
6.	Global finance	\$ 33,650.25	Self
Total Unsecured Debt (add lines 1-6)		\$ 74,287.72	

CERTIFICATION

Attorney Information: Complete the following sentences:

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 \$ 3500 on my behalf.
3. I have a credit with my attorney in the amount of \$ _____.
4. I currently owe my attorney a total of \$ _____.
5. I owe my prior attorney a total of \$ _____.


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

Nw 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.

Nw 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.


Signature

12/30/19
Date

CERTIFICATE OF SERVICE

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

That on (date) January 3, 2020 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:

Kenneth Robbins, Esq., familyfirst@halfpricelawyers.com

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

herein to: _____

Executed on the 3rd day of January, 2020.


Signature

11/22/2019

Nadine Williams

0.00

NON-NEGOTIABLE

****This is not a check. *****Advice of deposit only****

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 11/01/2019 - 11/15/2019

Nadine Williams 10116 Desert Trees St Las Vegas NV, 89141	PAY	Hours	Rate	Current	YTD
	Employee Taxes Paid by E	-	-	0.00	24.85
	Missed Visit	-	25.00	0.00	2,350.00
	On Call - Daily	-	25.00	0.00	225.00
	On Call - Weekend	-	150.00	0.00	2,625.00
	RN Visit Rate	87.00	58.36	5,077.32	109,687.62
	Training	-	40.58	0.00	202.90
	Case Conference	1.00	58.36	58.36	700.32
AHC Home Health of Las Vegas LL 10561 Jeffreys St Ste 105 Henderson NV, 89052	RN Start of Care	2.00	106.00	212.00	8,268.00
	RN Discharge	7.00	74.28	519.96	14,930.28
	Other	-	-	0.00	8,101.22
	OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	529.70	13,806.60
Social Security	56.37	8,239.80
Medicare	79.03	1,992.90

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	8,408.40
Delta Dental of Idaho	28.00	616.00
VSP	7.00	154.00

Pay Period
11/01/2019 - 11/15/2019

Pay Date
11/22/2019

MEMO:

BENEFITS	Used	Available
Vacation	0.00	98.52

SUMMARY	Current	YTD
Total Pay	\$5,867.64	\$147,115.19
Taxes	\$665.10	\$24,039.30
Deductions	\$417.20	\$9,178.40

NET PAY: **\$4,785.34**
Acct# 2298: \$4,785.34

Nadine Williams 10116 Desert Trees St Las Vegas NV, 89141	PAY	Hours	Rate	Current	YTD
	Employee Taxes Paid by E	-	-	0.00	24.85
	Missed Visit	-	25.00	0.00	2,350.00
	On Call - Daily	-	25.00	0.00	225.00
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Pay Period
11/01/2019 - 11/15/2019

Pay Date
11/22/2019

MEMO:

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Acct# 2298: \$4,785.34

12/23/2019

Nadine Williams

0.00

NON-NEGOTIABLE

****This is not a check. *****Advice of deposit only****

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 12/01/2019 - 12/15/2019

Nadine Williams 10116 Desert Trees St. Las Vegas NV, 89141	PAY					TAXES	
	Hours	Rate	Current	YTD		Current	YTD
	-	-	0.00	24.85	Employee Taxes Paid by E	527.37	14,729.49
	-	25.00	0.00	2,500.00	Federal Income Tax	0.00	8,239.80
	-	25.00	0.00	225.00	Social Security	78.88	2,156.98
	-	150.00	0.00	2,925.00	Medicare		
	84.00	58.36	4,902.24	119,492.10			
	-	40.58	0.00	202.90			
	-	58.36	0.00	758.68			
	2.00	106.00	212.00	8,480.00			
AHC Home Health of Las Vegas LL 10561 Jeffreys St Ste 105 Henderson NV, 89052	10.00	74.28	742.80	15,970.20	DEDUCTIONS		
	-	-	0.00	8,686.82	Current	YTD	
	OTHER PAY				Blue Cross of Idaho	382.20	9,172.80
					Delta Dental of Idaho	28.00	672.00
					VSP	7.00	168.00

Pay Period
12/01/2019 - 12/15/2019

Pay Date
12/23/2019

MEMO:

BENEFITS	Used	Available
Vacation	0.00	100.87

SUMMARY	Current	YTD
Total Pay	\$5,857.04	\$159,265.55
Taxes	\$606.25	\$25,126.27
Deductions	\$417.20	\$10,012.80
NET PAY:		\$4,833.59
Acct# 2298:		\$4,833.59

Nadine Williams 10116 Desert Trees St. Las Vegas NV, 89141	PAY					TAXES	
	Hours	Rate	Current	YTD		Current	YTD
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					VSP	7.00	168.00

Pay Period
12/01/2019 - 12/15/2019

Pay Date
12/23/2019

MEMO:

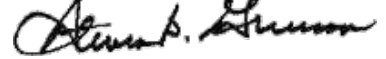
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MISC

Name: Kenneth M. Robbins, Esq.
Address: 732 S. 6th Street Suite 100
Las Vegas, NV 89101
Phone: 702-400-0000
Email: FamilyFirst@halfpricelawyers.com
Attorney for: Defendant
Nevada State Bar No. 13572

Electronically Filed
1/6/2020 4:39 PM
Steven D. Grierson
CLERK OF THE COURT



Judicial District Court
Clark County, Nevada

<u>Nadine Williams</u> Plaintiff,	Case No. <u>D-19-586291-D</u>
vs. <u>Herman Williams</u> Defendant.	Dept. <u>I</u>

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (first, middle, last) Herman George Williams JR.
2. How old are you? 50
3. What is your date of birth? 8/5/1969
4. What is your highest level of education? 12

B. Employment Information:

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

☐ No

☐ Yes If yes, complete the table below. Attached an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
	<u>Exquisite Towing Tow/Driver</u>		<u>M-S</u>	<u>Anytime</u>

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: _____ Date of Hire: _____ Date of Termination: _____

Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending _____ my gross year to date pay is _____.

B. Determine your Gross Monthly Income.

Hourly Wage

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

Annual Salary

	÷	12	=	
Annual Income		Months		Gross Monthly Income

C. Other Sources of Income.

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

Total Average Gross Monthly Income (add totals from B and C above)	
---	--

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	0
2.	Federal Health Savings Plan	0
3.	Federal Income Tax	0
4.	Health Insurance Amount for you: For Opposing Party: For your Child(ren):	Medicaid
5.	Life, Disability, or Other Insurance Premiums	0
6.	Medicare	
7.	Retirement, Pension, IRA, or 401(k)	0
8.	Savings	
9.	Social Security	0
10.	Union Dues	0
11.	Other: (Type of Deduction)	

Total Monthly Deductions (Lines 1-11)

Varies per week

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	2		
Commissions, wages or fees			
Business Entertainment/Travel	0		
Insurance			\$538.00
Legal and professional			
Mortgage or Rent	0		
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est. tax payments)			
Utilities	0		
Other:			
Total Average Business Expenses			\$538.00 -

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 checked="" type="checkbox"/>	Other Party <input type="checkbox"/>	For Both <input type="checkbox"/>
Alimony/Spousal Support	Q			
Auto Insurance	\$538.7139	/		
Car Loan/Lease Payment	\$500.00	/		
Cell Phone	\$800.00	/		
Child Support (not deducted from pay)	Q			
Clothing, Shoes, Etc...	VARIES	/		
Credit Card Payments (minimum due)	Q			
Dry Cleaning	Q			
Electric	\$175.00	/		
Food (groceries & restaurants)	\$500.00	/		
Fuel	\$700.	/		
Gas (for home)	\$95.00	/		
Health Insurance (not deducted from pay)	Q			
HOA	Q			
Home Insurance (if not included in mortgage)	\$33.00	/		
Home Phone				
Internet/Cable	\$125.00	/		
Lawn Care	Q			
Membership Fees	Q			
Mortgage/Rent/Lease	\$1450.00	/		
Pest Control	Q			
Pets	Q			
Pool Service	Q			
Property Taxes (if not included in mortgage)	Q			
Security	Q			
Sewer	Q			
Student Loans	Q			
Unreimbursed Medical Expense				
Water	\$170.00	/		
Other:				
Total Monthly Expenses	\$5225.00			

Household Information

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

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	Abigail Williams	10/27/94		yes	NO
2 nd	Herman III Williams	8/4/68	Father	yes	NO
3 rd	Matthew Williams	5/13/10	Father	yes	NO
4 th	Elisha Williams	4/26/13	Father	yes	NO

- 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	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone	Abigail (200)	Herman (200)	Matthew (200)	Elisha (200)
Child Care	Q	Q	Q	Q
Clothing	VARIES	VARIES	VARIES	VARIES
Education				
Entertainment				
Extracurricular & Sports				
Health Insurance (if not deducted from pay)	medicaid			
Summer Camp/Programs	Q			
Transportation Costs for Visitation	Q			
Unreimbursed Medical Expenses				
Vehicle				
Other:	200/	200/	200/	200/
Total Monthly Expenses	VARIES	VARIES	VARIES	VARIES

in school

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

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
Sean Williams		Mother	VARIES
Halle Williams		Sister	VARIES

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.	Medical Bill	\$	- \$ 68,000	= \$	ME
2.	2004 Chevy	\$	- \$	= \$	
3.	Silverado	\$	- \$ 2793	= \$	ME
4.		\$	- \$	= \$	
5.		\$	- \$	= \$	
6.		\$	- \$	= \$	
7.		\$	- \$	= \$	
8.		\$	- \$	= \$	
9.		\$	- \$	= \$	
10.		\$	- \$	= \$	
11.		\$	- \$	= \$	
12.		\$	- \$	= \$	
13.		\$	- \$	= \$	
14.		\$	- \$	= \$	
15.		\$	- \$	= \$	
Total Value of Assets (add lines 1-15)		\$	- \$	= \$	

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.	Laser printer	\$ 38,000	Nadine Williams
2.		\$	
3.		\$	
4.		\$	
5.		\$	
6.		\$	
Total Unsecured Debt (add lines 1-6)		\$ 38,000 + revaluation.	

CERTIFICATION

Attorney Information: Complete the following sentences:

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 \$ 2900.00 on my behalf.
3. I have a credit with my attorney in the amount of \$ _____.
4. I currently owe my attorney a total of \$ 3.000.
5. I owe my prior attorney a total of \$ _____.

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

HW 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.

HW 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.

Hamilton
Signature

12/8/19
Date

CERTIFICATE OF SERVICE

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

That on (date) January 6, 2020 service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

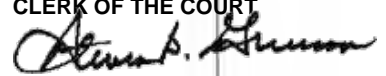
☐ Via 1st Class U.S. Mail, postage fully prepaid addressed as follows:

☒ Via Electronic Service, in accordance with the Master Service List, pursuant to NEFCR 9, to:
bartney@fjtest.com
frank@fjtest.com

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

Executed on the 6 day of January, 2020

Ananda
Signature



1 CSERV
Kenneth M. Robbins, Esq.
2 Nevada Bar No.: 13572
732 South 6th Street, Suite #100
3 Las Vegas, NV 89101
(702) 400-0000 Telephone
4 FamilyFirst@HalfPriceLawyers.com
"Unbundled" Attorney for Defendant

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

7 NADINE WILLIAMS,

8 Plaintiff,

9 vs.

10 HERMAN GEORGE WILLIAMS,

11 Defendant

)
) Case No.: D-19-586291-D

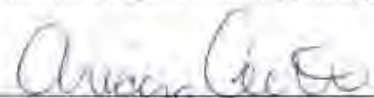
)
) Dept.: I

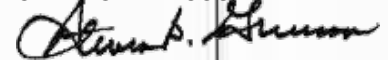
) **CERTIFICATE OF SERVICE**

12
13 I hereby certify that on the 6 day of January, 2020, the foregoing
14 **DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF REQUESTS FOR**
15 **PRODUCTION OF DOCUMENTS** was served by electronic service via the Eighth
16 Judicial District Court E-Filing System to the following at their last known addresses:

17 FRANK TOTI, Esq.
britney@fjtest.com
18 frank@fjtest.com
Counsel for Plaintiff

20 Dated this 6 day of January, 2020.

21 
22 Legal Assistant



1 **PSER**
2 **FRANK J TOTI 005804**
3 **6900 Westcliff Drive #500**
4 **Las Vegas Nevada 89145**
5 **p 702.364.1604 f 702.364.1603**
6 **frank@fjtesq.com**
7 **Attorney for Plaintiff**

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

10 **NADINE WILLIAMS,**

11 **Plaintiff,**

12 **v**

13 **HERMAN GEORGE WILLIAMS,**

14 **Defendant.**

Case No. D-19-586291-D

Dept No. I

15 **PROOF OF SERVICE**

16 I hereby certify that service of the foregoing **PLAINTIFF'S ANSWERS TO**
17 **DEFENDANT'S FIRST SET OF INTERROGATORIES** and
18 **PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF**
19 **REQUESTS FOR ADMISSIONS** was made on the 3rd day of January,
20 2020, pursuant to NRCP 5(b)(2)(D), and EDCR 8.05, by electronic service
21 via the Court's E-Filing System, proof of which is attached hereto, as
22 follows:

23 **Kenneth Robbins, Esq.**
24 **familyfirst@halfpricelawyers.com**
25 **Attorney for Defendant**



26 **FRANK J TOTI, ESQ. 005804**
27 **6900 Westcliff Drive #500**
28 **Las Vegas Nevada 89145**

Britney

From: efilimgmail@tylerhost.net
Sent: Friday, January 03, 2020 1:15 PM
To: Britney
Subject: Notification of Service for Case: D-19-586291-D, Nadine Alecia Williams, Plaintiffvs.Herman George Williams, Defendant. for filing Service Only, Envelope Number: 5431449



Notification of Service

Case Number: D-19-586291-D
Case Style: Nadine Alecia Williams,
Plaintiffvs.Herman George Williams, Defendant.
Envelope Number: 5431449

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	D-19-586291-D
Case Style	Nadine Alecia Williams, Plaintiffvs.Herman George Williams, Defendant.
Date/Time Submitted	1/3/2020 1:14 PM PST
Filing Type	Service Only
Filing Description	Plaintiff's Answer to Defendant's First Set of Interrogatories
Filed By	Britney Robinson
Service Contacts	Nadine Alecia Williams: Frank Toti (frank@fjtesq.com) Britney Robinson (britney@fjtesq.com) Herman George Williams: Kenneth Robbins, Esq. (FamilyFirst@HalfPriceLawyers.com)

Document Details	
Served Document	Download Document
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Britney

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Notification of Service

Case Number: D-19-586291-D
Case Style: Nadine Alecia Williams,
Plaintiffvs.Herman George Williams, Defendant.
Envelope Number: 5431449

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

Filing Details	
Case Number	D-19-586291-D
Case Style	Nadine Alecia Williams, Plaintiffvs.Herman George Williams, Defendant.
Date/Time Submitted	1/3/2020 1:14 PM PST
Filing Type	Service Only
Filing Description	Plaintiff's Answers to Defendant's First Set of Requests for Admissions
Filed By	Britney Robinson
Service Contacts	Nadine Alecia Williams: Britney Robinson (britney@fjtesq.com) Frank Toti (frank@fjtesq.com) Herman George Williams: Kenneth Robbins, Esq. (FamilyFirst@HalfPriceLawyers.com)

Document Details	
Served Document	Download Document
This link is active for 30 days.	

1 TRANS

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COPY

FILED

JAN 11 2022

Sharon A. Quinn
CLERK OF COURT

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

NADINE ALECIA WILLIAMS,)
)
Plaintiff,)
)
vs.)
)
HERMAN GEORGE WILLIAMS,)
)
Defendant.)

CASE NO. D-16-586291-D
DEPT. I
APPEAL NO. 83263
(SEALED)

BEFORE THE HONORABLE CHERYL MOSS
DISTRICT COURT JUDGE

TRANSCRIPT RE: CALENDAR CALL

WEDNESDAY, JANUARY 22, 2020

APPEARANCES:

The Plaintiff:
For the Plaintiff:

NADINE ALECIA WILLIAMS
FRANK TOTI, ESQ.
6900 Westcliff Drive, #500
Las Vegas, Nevada 89145
(702) 364-1604

The Defendant:
For the Defendant:

HERMAN GEORGE WILLIAMS
KENNETH M. ROBBINS, ESQ.
9205 W. Russel Rd., #240
Las Vegas, Nevada 89148
(702) 608-2331

1 LAS VEGAS, NEVADA

WEDNESDAY, JANUARY 22, 2020

2 P R O C E E D I N G S

3 (THE PROCEEDINGS BEGAN AT 09:10:46)

4

5 THE COURT: We're going to do Williams, case D-
6 586291. Counsel, your appearances and bar numbers?

7 MR. TOTI: Your Honor, Frank Toti, bar number 5804,
8 for the Plaintiff.

9 THE COURT: Thank you.

10 MR. ROBBINS: Good morning. Kenneth Robbins, bar
11 number 13572, unbundled, with Herman Williams.

12 THE COURT: One unbundled? Okay. This is a -- just
13 our calendar call. Let's see. Can you lawyers tell me which
14 classes each of the parents have -- have completed. And then
15 the second issue is Donna Gosnell.

16 MR. TOTI: Your Honor, with regard to the parenting
17 classes, my client just finished COPE, and that was the final
18 thing she needed to do. So the ABCs and the -- oh, I'm sorry.
19 She has a couple of makeup classes to do with ABC.

20 THE COURT: Okay.

21 MR. TOTI: She's done with COPE, and what was the
22 other one?

23 THE COURT: The -- is it the high conflict --

24 MR. TOTI: High conflict --

1 THE COURT: -- online class?
2 THE PLAINTIFF: Yes.
3 MR. TOTI: And that's done, as well.
4 THE COURT: She -- she has to do that one?
5 THE PLAINTIFF: No, I'm finished.
6 THE COURT: I'm -- I --
7 MR. TOTI: No, she has no high conflict -- she's
8 done with --
9 THE COURT: She has to do high conflict --
10 MR. TOTI: -- high conflict. She just has a couple
11 of make ups for the --
12 THE PLAINTIFF: ABC --
13 THE COURT: ABCs.
14 MR. TOTI: -- ABCs.
15 THE COURT: Well, she's supposed to do Triple P. Or
16 that is the Triple P --
17 THE PLAINTIFF: No, the last class, Your Honor, is
18 on Friday.
19 THE COURT: Okay. How about Dad?
20 MR. ROBBINS: I think he's completed all of them.
21 We filed --
22 THE COURT: According to my notes --
23 MR. ROBBINS: -- certificates --
24 THE COURT: -- he has. Yes. Okay. Mr. Toti, was

1 Mom supposed to arrange Donna Gosnell?

2 MR. TOTI: Your Honor, back in the -- back at the
3 time that was ordered, we were having a hard time
4 communicating with the Defendant to coordinate and arrange
5 that.

6 THE COURT: Uh-huh.

7 MR. TOTI: Donna Gosnell was finally contacted by
8 the Defendant. However, Judge, what happened immediately
9 there -- don't forget that the purpose of the Donna Gosnell
10 counseling was between my client and the oldest female child.

11 THE COURT: Fifteen, Abigail.

12 MR. TOTI: And --

13 THE COURT: Correct?

14 MR. TOTI: -- she was having no contact with Mom.
15 Well, during the period of time before Donna Gosnell came in,
16 things have -- have flipped, Your Honor.

17 THE COURT: Yeah. Abigail's living with Mom and the
18 three other kids are living with Dad.

19 MR. TOTI: Correct. So -- so the -- the whole point
20 of it was to repair the relationship between Mom and the
21 oldest child --

22 THE COURT: Oh --

23 MR. TOTI: -- and obviously --

24 THE COURT: It's moot now.

1 MR. TOTI: -- so -- and, Judge, and that --
2 THE COURT: She's to have teenage discretion.
3 MR. TOTI: Correct.
4 THE COURT: If she continues to see her dad.
5 MR. TOTI: Yeah. You gave teenage discretion --
6 MR. ROBBINS: And she hasn't.
7 MR. TOTI: -- but there has been, I don't think, any
8 contact. I think that my client indicates that --
9 THE COURT: It looks like --
10 MR. TOTI: -- the child has texted her dad a few
11 times, but there's been no visitation.
12 THE COURT: Okay. Well, there's an issue there. So
13 she's --
14 MR. TOTI: And, Judge, what we would be -- what we'd
15 be looking to do as a result of all of these things, is we
16 would be asking for either a new child interview, or for a
17 guardian ad litem to be appointed so Your Honor can get some
18 insight as to the changing dynamics of the children in this
19 case.
20 THE COURT: I can do that, but Dad hasn't seen
21 Abigail since when?
22 MR. ROBBINS: Since Nevada Day.
23 THE COURT: And Mom has to encourage her with
24 teenage discretion not to just completely cut Dad off.

1 MR. TOTI: Mom has not. Mom has encouraged the
2 child --
3 THE COURT: Okay.
4 MR. TOTI: -- to text Dad and communicate with Dad,
5 and she's --
6 THE COURT: He should go with Gosnell, then, to work
7 on the relationship between him and his daughter. Yeah.
8 MR. ROBBINS: We have no --
9 THE COURT: I do finger pointing here, but --
10 MR. ROBBINS: Yeah.
11 THE COURT: -- it sounds like he needs to do the
12 therapy with Gosnell and -- and -- for him and his daughter.
13 MR. ROBBINS: Well --
14 THE COURT: They're sharing -- are they sharing
15 joint of the other three?
16 MR. TOTI: No, Judge.
17 MR. ROBBINS: No.
18 MR. TOTI: The children --
19 THE COURT: Dad is --
20 MR. TOTI: -- are primarily -- the three younger are
21 primarily with the Defendant --
22 THE COURT: Okay.
23 MR. TOTI: -- and again, that's why we were looking
24 for an -- for a -- for an updated --

1 THE COURT: All right. These parents are not going
2 to be able to figure out -- we are going to trial on February
3 4th at 1:30, so you're stack one.

4 MR. TOTI: Okay.

5 THE COURT: And you have your lists -- pretrial
6 memos, witnesses, exhibits?

7 MR. TOTI: No. I don't think there's going to be
8 any witnesses other than the parties, Judge. The pretrial --
9 my pretrial memorandum has not been filed. I was hoping to
10 get to it by Friday.

11 THE COURT: I can give you until Friday. How about
12 you, Mr. Robbins?

13 MR. ROBBINS: Same.

14 THE COURT: Okay. List your -- so no surprises
15 here, just the parents probably going to testify? No family
16 members, or --

17 MR. ROBBINS: Your Honor, I think we had some of his
18 family members on our --

19 THE COURT: Can you --

20 MR. ROBBINS: -- witness list.

21 THE COURT: -- give us a heads up, and I usually
22 like only --

23 (COUNSEL AND DEFENDANT CONFER BRIEFLY)

24 THE COURT: They're not going to say the same thing,

1 are they, about his parenting? They got to be different
2 testimony.

3 (COUNSEL AND DEFENDANT CONFER BRIEFLY)

4 THE COURT: Sister? And who else?

5 MR. ROBBINS: Plaintiff's mother.

6 THE COURT: And the maternal grandmother? Okay.
7 Mom has to -- any heads up?

8 MR. TOTI: No, Judge. We just --

9 THE COURT: It's just -- Mom just wants to do the
10 Mom herself. Okay. So the pretrials are due by Friday, close
11 of business. Your list of witnesses, exhibits.

12 MR. TOTI: And again, Judge, is there an ability to
13 have something updated in regards to the children? That was a
14 very important piece of the case, the child interview, when
15 Your Honor set in the original visitation schedule. But quite
16 obviously --

17 THE COURT: Mom's only on day visits two days a week
18 --

19 MR. TOTI: Mom's only on day visits --

20 MR. ROBBINS: One --

21 MR. ROBBINS: -- with the three younger.

22 THE COURT: One day.

23 MR. TOTI: Originally, Judge, it was only with the
24 three younger and -- and the daughter was on teen discretion.

1 THE COURT: Okay.

2 MR. TOTI: But like I said, it's now flopped 100

3 percent. I --

4 THE COURT: How's the visits going with the young

5 ones? They fine?

6 THE PLAINTIFF: When I do get them, because he

7 hasn't been bringing them --

8 THE COURT: Yeah.

9 THE PLAINTIFF: -- when I do get them, they will go

10 well, and sometimes at the end, they just start a fight and

11 get upset, and just -- so it -- last week was totally fine.

12 We had no issues --

13 THE COURT: Maybe they need to get counseling.

14 THE PLAINTIFF: I --

15 THE COURT: Family counseling for you and those

16 three little ones.

17 THE PLAINTIFF: -- I -- I think so, Your Honor,

18 because it's like --

19 THE COURT: So --

20 THE PLAINTIFF: -- it's -- it's -- they're

21 conflicted, and, you know, I -- I can see that, and --

22 THE COURT: Okay.

23 THE PLAINTIFF: -- so I -- I really do try to talk

24 to them, but --

1 THE COURT: So these parents want to go to trial
2 based on what we have currently today?
3 MR. TOTI: It --
4 MR. ROBBINS: Well, I don't mind if we can do a
5 child interview for the daughter right away. Because we have
6 no idea why --
7 THE COURT: Have they ever been interviewed at all?
8 MR. ROBBINS: The daughter was interviewed --
9 MR. TOTI: (Indiscernible), Judge.
10 THE COURT: Yeah.
11 MR. ROBBINS: The daughter was interviewed, and she
12 said she wanted to live with Dad, and then one visit with Mom,
13 and now she wants nothing to do with Dad. So we need to know
14 why --
15 THE COURT: Uh-huh.
16 MR. ROBBINS: -- and we've never gotten an
17 indication --
18 THE COURT: Schedule it.
19 MR. ROBBINS: -- as to why.
20 THE COURT: Not -- yes, the -- the FMC child
21 interviews would be admissible at trial, even though they're
22 not recorded. So you both understand that, you stipulate that
23 --
24 MR. ROBBINS: Yes, Judge.

1 THE COURT: -- we would admit that as a Court's
2 sealed exhibit, and you don't want to include the other three,
3 because Mom's --

4 MR. TOTI: I -- I would want all children
5 interviewed, Judge. Just for --

6 THE COURT: All right. Probably makes sense --

7 MR. TOTI: -- an update because they were all
8 interviewed initially.

9 THE COURT: Have all four kids interviewed, and get
10 that done right away. So if trial's February 4th, I need a
11 marathon interview. So you need to make a phone call
12 downstairs and get them in right away. Four kids, just an
13 interview.

14 I could leave Donna Gosnell in place so Mom needs it
15 for the three kids, and Dad needs it for the daughter. Yeah.
16 I don't know what the custody will be like, come February 4th.
17 If they want to keep that trial date, we'll start the trial
18 then. Yeah. But the interview might shed some light --

19 MR. TOTI: That's what I was thinking, Judge. And I
20 know Your Honor --

21 THE COURT: -- and maybe the parents can talk, and
22 --

23 MR. TOTI: -- Your Honor, what is --

24 THE COURT: Yeah?

1 MR. TOTI: -- if -- if we -- if we forego the
2 February 4th date, what -- what else do you have?

3 THE COURT: I'm kind of out to July, but I can find
4 a date, if you give me a month, what month you want to go.
5 Give it like another 90 days of counseling and therapy? I'll
6 see if I can squeeze you in somewhere. That would be
7 February, March, April -- so it's like early May or late
8 April. Let's see what I have. Let me see. Maybe I have --

9 MR. ROBBINS: Your Honor, we don't mind pushing out
10 the trial, but --

11 THE COURT: I can fill that one with something else.

12 MR. ROBBINS: -- he still doesn't have the truck.

13 THE COURT: Well, it's just a calendar call today.

14 MR. ROBBINS: Or the -- the plates for the truck,
15 rather.

16 THE COURT: Is it an emergency? Does he need it for
17 work?

18 MR. ROBBINS: Yeah. Yeah, it's a tow truck.

19 (COURT AND CLERK CONFER BRIEFLY)

20 THE COURT: Okay. What's going on with the truck,
21 Mr. Toti?

22 MR. TOTI: I'm asking my client now. She says it's
23 been registered --

24 THE COURT: It's been registered. Okay.

1 (COUNSEL AND PLAINTIFF CONFER BRIEFLY)
2 MR. TOTI: And, Your Honor, what I'll do is -- let
3 me make it really easy. I'll have my client bring the plates
4 to my office, and we'll get them to Defendant's Counsel's
5 office by Friday.
6 THE COURT: Okay.
7 (COURT AND CLERK CONFER BRIEFLY)
8 THE COURT: Maybe the parents want to wait until
9 after Memorial Day, when the kids get out of school. Or let
10 me see.
11 (COURT AND CLERK CONFER BRIEFLY)
12 MR. ROBBINS: I have a -- I have a day two with you,
13 I think it's in June that's going to settle, I'm pretty
14 confident.
15 THE COURT: What's the case name?
16 MR. ROBBINS: Salazar.
17 THE COURT: I'll have to look. You know their first
18 name?
19 MR. ROBBINS: Juan Salazar's my client. I don't
20 know the other one's name.
21 THE COURT: Yeah.
22 MR. ROBBINS: I think she has a different last name.
23 (COURT AND CLERK CONFER BRIEFLY)
24 THE COURT: Let me see. Because we have a lot of

1 Juan Salazars in our system. I don't know which one he is.
2 Do you know the date, June something, or if we could search?
3 MR. ROBBINS: June, I feel like it was June.
4 THE COURT: April, May, June. Okay. So starting on
5 June 1st, there is -- it's not that week. I don't think it's
6 that week.
7 (COURT AND CLERK CONFER BRIEFLY)
8 THE COURT: Is that a full day or a half day?
9 MR. ROBBINS: It's a half. It was a -- it was a
10 second day of the trial.
11 THE COURT: Oh, are they thinking of settling?
12 Okay.
13 MR. ROBBINS: I think so.
14 (COURT AND CLERK CONFER BRIEFLY)
15 THE COURT: Salazar, found it. With Carmen Amon
16 (ph)?
17 MR. ROBBINS: Yes.
18 THE COURT: That's a stack --
19 THE CLERK: One.
20 THE COURT: -- one but it's Tuesday, June 9th. I --
21 THE CLERK: (Indiscernible) --
22 THE COURT: Yeah, click on it. Okay. It's day two
23 of trial, but Mr. Robbins says they're thinking of settling.
24 I can give you June 9th, if Mr. Robbins is going to settle

1 that -- in the middle of trial. Could put you there.

2 MR. ROBBINS: I'm -- I'm pretty confident. I'm just
3 waiting on a call back from Carmen Amon.

4 THE COURT: Yeah. Well, you've got your calendar
5 cleared for that day. Mr. Toti, June 9th?

6 MR. TOTI: I can make June 9th work.

7 THE COURT: We'll put you there, stack one. Okay.
8 JA, do a -- here, write yourself a note, do another trial set
9 -- amended trial setting order.

10 MR. ROBBINS: Do we start at 9:00 or 9:30, Judge?

11 THE COURT: Those are 1:30. It's a half day.

12 MR. ROBBINS: Okay.

13 THE COURT: That's an afternoon. June 9th, 1:30.
14 Okay. Yeah, since you want to push it out to June, and you
15 don't know maybe your witnesses, I can do that like a month
16 before trial, or --

17 MR. ROBBINS: Okay.

18 THE COURT: Or you want to know who your witnesses
19 are.

20 MR. TOTI: I would say -- how about witnesses and
21 exhibits due by May 1? That's 30 days.

22 THE COURT: Yeah. That's fine with me. But as soon
23 as you find out who your witnesses will be, please disclose it
24 right away. Okay? May 1, pretrials due. So you don't have

1 to do them by Friday.

2 MR. TOTI: Thank you, Judge.

3 THE COURT: I'll give you until May 1st. So we'll

4 let them -- let the family do counseling for February, March,

5 April, May, and then early June, we go to trial. And then we

6 -- you want another calendar call, or just it is what it is,

7 or the parents will see where they're at?

8 MR. TOTI: No, I --

9 THE COURT: You know, by the end of the school year.

10 MR. TOTI: -- think once we get the child interview,

11 we'll get a call, so as long as we just get notice of the

12 child interviews --

13 THE COURT: I'll just have you pick up the

14 interviews.

15 MR. TOTI: Yeah.

16 THE COURT: Okay. We -- we got something schedule?

17 Child interviews?

18 THE CLERK: Yes. January 29th at 4:00 p.m.

19 THE COURT: January 29th, 4:00 p.m.

20 MR. TOTI: What's that one, Judge?

21 THE COURT: You're -- the children are going

22 downstairs.

23 MR. ROBBINS: Oh, that's the date of the interview?

24 THE COURT: Yes, four children. The FMC already

1 cleared the date.

2 MR. TOTI: Well, I apologize. What's the date,
3 Madam Clerk?

4 THE COURT: The 29th at what time? 4:00.

5 THE CLERK: 4:00 p.m.

6 THE COURT: After school.

7 THE CLERK: January 29th.

8 THE COURT: Any topic areas? The parents are not
9 supposed to tell them any questions. Just tell them to tell
10 the truth again.

11 MR. TOTI: Just a -- just a --

12 THE COURT: Relationship with parents?

13 MR. TOTI: I would -- I would just ask that the
14 child interview review the previous interview, and just go off
15 of that.

16 THE COURT: Review prior interview. Relationship
17 with parents, maybe time share preferences. That gives us --
18 the interview will be happening right away, so that'll give us
19 -- do the parents need any help with the fees, due to their
20 incomes?

21 MR. ROBBINS: Well, Dad --

22 THE COURT: With the cost?

23 MR. ROBBINS: Well, Dad does.

24 THE COURT: So I'll have 50 percent of fees waived

1 for both.

2 MR. TOTI: And then --

3 THE COURT: Because they've got four kids. It's
4 going to be expensive.

5 MR. TOTI: -- one small issue --

6 THE COURT: So we'll charge them half.

7 MR. TOTI: -- to -- to address to the Court prior to
8 the June 9th trial --

9 THE COURT: Uh-huh.

10 MR. TOTI: Judge at -- at a previous hearing, you
11 entered into -- an order, Your Honor's standard holiday
12 visitation schedule for -- for holidays, obviously.

13 THE COURT: Yes. Spring break, Easter --

14 MR. TOTI: And --

15 THE COURT: -- President's Day --

16 MR. TOTI: -- my client -- the Defendant is
17 indicating that because my client doesn't have regular
18 visitation with the male children overnight, that her
19 visitation for the holidays doesn't extend to overnights, and
20 that's not -- that's not what the standard holiday schedule
21 is. And my client did have overnight visitation with the kids
22 --

23 THE COURT: That was a consideration today, so we
24 can move Mom to overnights. That's why I asked how the visits

1 are going. If there's any major problems --
2 MR. TOTI: There have not been.
3 THE COURT: -- she should be able to go to
4 overnights.
5 MR. ROBBINS: Yeah, the problem is Dad getting the
6 children back when they're supposed to be.
7 MR. TOTI: Well, Judge --
8 THE COURT: Well, one --
9 MR. TOTI: -- the issue has been with Dad not giving
10 the kids --
11 THE COURT: -- I can enforce that, and two, she's
12 got proper --
13 MR. ROBBINS: Especially the daughter --
14 THE COURT: -- sleeping arrangements for all the
15 kids --
16 MR. TOTI: She does, Judge.
17 THE COURT: -- then she should have the overnights.
18 Weekends would be appropriate. Dad's still in charge of
19 homework for them.
20 (COUNSEL AND PLAINTIFF CONFER BRIEFLY)
21 MR. ROBBINS: Your Honor, I'd like to remind you --
22 THE COURT: Uh-huh.
23 MR. ROBBINS: -- the reasons why she couldn't have
24 overnights, and that was --

1 THE COURT: Yeah.

2 MR. ROBBINS: -- the extreme violence that was
3 occurring in her house.

4 THE COURT: But she's been having day visits since
5 November, I believe, or October?

6 THE PLAINTIFF: Since July, Your Honor.

7 MR. TOTI: Since July, Judge.

8 THE COURT: August 26th was the last hearing.

9 MR. ROBBINS: Substantiated CPS reports.

10 THE COURT: There haven't been any issues. She's
11 been appropriate with the children from August 26th, 2019,
12 hearing. That's September, October, November, December,
13 January, almost five months of zero incidents --

14 MR. ROBBINS: Well, I would say that there's been
15 zero incidents. Dad has information that her boyfriend has
16 been physically violent --

17 THE PLAINTIFF: Oh, God. That's --

18 MR. ROBBINS: -- with the children, too.

19 THE PLAINTIFF: -- not true.

20 MR. TOTI: What evidence of that is there?

21 THE COURT: Get me that FMC interview. I don't have
22 that here.

23 MR. ROBBINS: Your Honor -- Your Honor, if Your
24 Honor's not willing to --

1 THE COURT: I get these generic allegations --
2 MR. ROBBINS: And that's going to -- that's going to
3 be part of the interview, as well, or -- their relationship,
4 but --
5 THE COURT: Well, what kind of prima facie proof do
6 you have? I mean, is it so bad you call to call CPS? Do I
7 need to get CPS records?
8 (COUNSEL AND DEFENDANT CONFER BRIEFLY)
9 THE COURT: They ask about the Mom's boyfriend, but
10 that's -- it's kind of a general accusation.
11 MR. ROBBINS: One of the sons took a picture of
12 something actually happening in -- in -- in the action.
13 THE COURT: The 11 year old son, or the nine year
14 old son.
15 MR. ROBBINS: The nine year old.
16 THE COURT: What are they doing taking pictures?
17 MR. ROBBINS: Because he saw his other -- his
18 brother getting dragged?
19 THE COURT: You got that picture?
20 THE DEFENDANT: Yeah. Just trying to find it.
21 THE COURT: By the boyfriend?
22 THE DEFENDANT: Yeah.
23 THE COURT: Okay.
24 THE DEFENDANT: Not the first time. It was the

1 second time, in the store, too. But I don't have a picture of
2 the store.

3 THE COURT: You file that picture?

4 MR. TOTI: I've never seen it, Judge.

5 THE COURT: Well, we're going to look at it now.
6 You can look at it.

7 THE COURT: That boyfriend stay there all the time?

8 THE PLAINTIFF: Yes, ma'am. And --

9 THE COURT: He lives with you full time, and the
10 kids --

11 THE PLAINTIFF: Yes. And the -- the thing that
12 tends to happen, Your Honor, is the six year old, he picks the
13 six year old up and take him out the store, because he will
14 start to --

15 THE COURT: They get rambunctious.

16 THE PLAINTIFF: Yes. And I don't -- we --

17 THE COURT: Okay. Let me see that picture.

18 MR. TOTI: I'm not sure what it's --

19 THE COURT: One thing I can do is say no corporal
20 punishment --

21 THE PLAINTIFF: There hasn't been, Your Honor. And
22 what has been happening is the Defendant has been --

23 THE COURT: He's not dragging him. He's just
24 showing him out the door or something.

1 MR. TOTI: Lifting him, I would say.
2 THE DEFENDANT: So with his hand on him.
3 THE PLAINTIFF: Yeah, so --
4 MR. ROBBINS: There shouldn't be any physical
5 contact --
6 THE PLAINTIFF: -- there is -- Your Honor --
7 MR. ROBBINS: -- between the boyfriend and -- and
8 the child.
9 THE COURT: I can -- well, I can order that, that
10 you going to have to take control of that, Mom, if you want
11 these overnights.
12 THE PLAINTIFF: Your -- Your Honor, this -- this --
13 THE COURT: I'm making solutions, ma'am.
14 THE PLAINTIFF: Yes. Yes, Your Honor. Yes. Yes,
15 Your Honor.
16 THE COURT: So your boyfriend's not to handle them,
17 you are.
18 THE PLAINTIFF: Yes, ma'am.
19 THE COURT: No corporal discipline. So you can put
20 him in time outs, take away privilege. We'll see how these
21 overnights are going. But the boyfriend's kind of -- like, he
22 can't -- he can't physically deal with them. You're going to
23 have to.
24 THE PLAINTIFF: Yes, ma'am.

1 MR. TOTI: So, Judge, just to avoid --
2 THE COURT: So the boyfriend's corporally punish or
3 physically discipline on any of the kids --
4 MR. TOTI: We would suggest my client hook up --
5 THE COURT: Mom can handle that, and Mom will not --
6 no, neither parent, both households, no spanking --
7 MR. TOTI: Of course, Judge.
8 THE COURT: -- no -- that's it. No spanking. Put
9 them in timeouts, and --
10 THE PLAINTIFF: I take the phones, I take the iPads,
11 I do that.
12 THE COURT: Take away privileges. But if they --
13 you take away their iPhones and iPads, but if they say, I want
14 to talk to my dad, you can give them their phone, and then
15 take it back.
16 THE PLAINTIFF: Yes, ma'am. I do that.
17 THE COURT: They can make that call.
18 THE PLAINTIFF: Or I'll have them use the house
19 phone.
20 THE COURT: And it doesn't seem like Mom is
21 restricting their phones to block access to Dad --
22 THE PLAINTIFF: No --
23 THE COURT: -- so I'm going to say no spanking, no
24 corporal discipline, no showing them out the door, and the --

1 that will take care of any concerns.

2 MR. TOTI: So, Judge --

3 THE COURT: If it continues to happen, and these
4 pictures keep coming to light, you know -- but I can see kids
5 getting rambunctious, you know, and I don't -- I don't know
6 what prompted that, that other son to take the picture. But I
7 -- I -- we'll -- we'll deal with that at -- at trial. But
8 they need to go to counseling.

9 MR. TOTI: So, Judge, then we would --

10 THE COURT: And both parents are doing their
11 parenting classes, so there has to be more effective ways of
12 parenting.

13 MR. TOTI: We would suggest Friday after school
14 until Monday to school, to avoid the exchanges?

15 THE COURT: They -- parents don't like each other,
16 they don't have to come into contact with each other, but it's
17 the best way to do it.

18 (COUNSEL AND DEFENDANT CONFER BRIEFLY)

19 THE COURT: Yeah, and there's no homework on Friday
20 nights.

21 MR. ROBBINS: The problem is, the one time Mom was
22 responsible for bringing the child to school, she dropped him
23 off extremely sick, with snot all over his face.

24 THE COURT: Uh-huh.

1 MR. ROBBINS: And that's the one time that's she's
2 dropped them --
3 MR. TOTI: When was that?
4 MR. ROBBINS: -- to -- to school, and the school had
5 to call Dad.
6 MR. TOTI: When was this?
7 THE DEFENDANT: This was the last time took them --
8 THE COURT: Okay.
9 THE DEFENDANT: -- that was the Thanksgiving
10 holiday.
11 THE COURT: You know --
12 THE DEFENDANT: Dropped them off, and called me --
13 and text me at 6:00 -- 6:49 in the morning, telling me, you
14 need to go pick him up, because he's not feeling good. The
15 school called me to go pick him up. I picked him up, took him
16 straight to the doctor. I got a picture right here. You
17 can't drop him off like that.
18 MR. TOTI: And of course -- and Judge, and
19 obviously, had my client taken the child to the doctor, the
20 argument would have been that she didn't take the children to
21 school. So I -- I appreciate that, but Your Honor's correct
22 --
23 THE COURT: That's a parent call. That's a judgment
24 call.

1 MR. TOTI: It is.

2 THE COURT: Does that make her a bad parent because
3 she dropped off a kid with a runny nose? And they're not --
4 neither of you are medical doctors, so it could be a, you
5 know, 50/50 call whether you take that kid to school. But
6 it's not like you abused the kid. It's not -- I don't think
7 it's medical neglect.

8 And so the parents are just criticizing each other
9 about how the way they parent the kid, but I'm -- I'm looking
10 for things like, are you putting the kid in severe risk or
11 danger? What was the diagnosis at the doctor's? Did you tell
12 -- did you inform Mom you took the child to the doctor? Do
13 you prefer they call Mom first, before they call you, to go
14 pick him up? And if they had called Mom, she would have
15 picked the kid up.

16 THE PLAINTIFF: I -- I administered treatment --

17 THE COURT: Get out of work and go get -- take that
18 kid to the doctor.

19 THE PLAINTIFF: Yes, ma'am.

20 THE COURT: They have a school medical nurse who can
21 evaluate the child's symptoms. A lot of kids go to school
22 with runny noses. Okay? I'm not taking sides here, but I'm
23 looking for, you know, severe, grave risk, danger. But what
24 was -- what was the diagnosis? A cold? Or did that kid have

1 severe pneumonia and did he get admitted to the hospital
2 overnight? That's what I'm looking for. But each criticize
3 each other in your parenting, and that's why I sent you to
4 like, three or four parenting classes. Okay.

5 MR. ROBBINS: But, Your Honor --

6 THE COURT: Save that one for trial. And we'll
7 bring that kid's medical records. If the doctor just says --
8 you know, did he have an infection? Or -- or is it just --
9 it's just a simple cold? Okay. Everybody's on pins and
10 needles about being accused, and they're looking for things to
11 accuse them of every single day.

12 MR. ROBBINS: Your Honor, the -- the --

13 THE COURT: Yeah --

14 MR. ROBBINS: -- teenage discretion with the
15 daughter is obviously not working --

16 THE COURT: That's not teenage discretion if you
17 totally cut off the dad.

18 MR. TOTI: It's not --

19 THE COURT: You need to work on your daughter more
20 about that.

21 MR. TOTI: She is having her text --

22 THE PLAINTIFF: I have called -- I had her call him.
23 He doesn't answer the phone. She's texted multiple times.

24 THE COURT: Uh-huh.

1 THE PLAINTIFF: She even went as far as saying --
2 THE COURT: She texts him? She reaches out?
3 THE PLAINTIFF: Yes. And she's even said, how are
4 we supposed to have a relationship --
5 THE COURT: We'll find out from the child interview.
6 THE PLAINTIFF: -- when you --
7 THE COURT: So the 29th, add another week, and then
8 call my secretary for the report.
9 MR. TOTI: Okay.
10 THE COURT: You'll have your week -- your report
11 like a week after. They just take a week to type it up.
12 MR. TOTI: Okay. Thank you, Your Honor.
13 THE COURT: Yeah.
14 MR. ROBBINS: Your Honor, Dad just told me -- I
15 guess the kids are telling him that Abigail's driving. She
16 doesn't --
17 THE PLAINTIFF: Oh, God.
18 MR. ROBBINS: -- have a permit or a license. She's
19 15.
20 THE DEFENDANT: She can't get her permit until she's
21 15-and-a-half. That's why our boys, every Saturday, they
22 don't want to go.
23 THE COURT: Uh-huh.
24 THE DEFENDANT: They don't want to go. They wait

1 until I get halfway there, oh, no, I don't want to go, because
2 Abigail be driving. She in the backseat, and Abigail is
3 driving. She can't drive until she 15-and-a-half --

4 THE COURT: And they didn't take a picture of that?

5 THE DEFENDANT: Because their phones -- they didn't
6 have a phone.

7 MR. TOTI: All of these things would have been a
8 great motion.

9 THE COURT: Right.

10 MR. TOTI: All of these allegations would have been
11 a --

12 THE COURT: Yeah, this is high --

13 MR. TOTI: -- great motion.

14 THE COURT: -- after all the parenting classes, we
15 are still in high conflict mode, and that's -- that's not good
16 for the kids. All right. So I'll make an order, sir. Mom is
17 not to -- not saying she is, let the child drive without a
18 proper permit.

19 MR. TOTI: Of course, Judge.

20 THE COURT: Okay?

21 THE PLAINTIFF: Yes, ma'am.

22 THE COURT: Boyfriend's not to, you know, lay a hand
23 on them. Not saying he did or didn't.

24 THE PLAINTIFF: Yes, ma'am.

1 THE COURT: But you see what's -- what going on?
2 The kids are at your house, and they're taking pictures. What
3 can you do? Evaluate it and, you know, see if -- if it
4 warrants anything. Okay?

5 MR. TOTI: And, Judge, just so --

6 THE COURT: And so as far as the daughter, you want
7 to see your daughter, right?

8 THE DEFENDANT: Yeah. I haven't -- I haven't done
9 nothing to this girl. I yelled at her and screamed at her for
10 smoking weed.

11 THE COURT: Uh-huh.

12 THE DEFENDANT: Found the weed in the house --

13 THE COURT: Uh-huh.

14 THE DEFENDANT: Found the stuff she use. I yelled
15 at her, turned off her phone --

16 THE COURT: Uh-huh.

17 THE DEFENDANT: -- and --

18 THE COURT: And you know --

19 THE DEFENDANT: -- the 25th, she got picked up from
20 school, and it's like, I got a phone call --

21 THE COURT: She's acting out.

22 THE DEFENDANT: -- she's 15, she has a choice. She
23 don't have to live with you.

24 THE COURT: Right.

1 THE DEFENDANT: She texted me and told me, oh,
2 Abigail says if she move back to your house --
3 THE COURT: So who's running your households, right?
4 THE DEFENDANT: -- if she come back your house, she
5 going to kill herself.
6 THE COURT: You can't let her.
7 THE DEFENDANT: I said, take her to the hospital --
8 THE COURT: Since she's living with you, Mom, you
9 need to back Dad up if he's trying to discipline the daughter.
10 THE PLAINTIFF: Your Honor, it didn't happen like
11 that.
12 THE COURT: And second of all -- yeah, because she's
13 -- she can go live with Dad tomorrow if she wanted to.
14 MR. TOTI: She could. And, Judge -- and --
15 THE COURT: If she don't like your rules --
16 MR. TOTI: -- Mom has --
17 THE COURT: -- and now who's running your
18 households?
19 MR. TOTI: -- Mom has --
20 THE COURT: Right.
21 MR. TOTI: -- made the child reach out several
22 times.
23 THE COURT: Yeah.
24 THE DEFENDANT: Not several times. It's --

1 THE COURT: So what schedule --

2 THE DEFENDANT: When we came to Court in December

3 16th, as we walked out the door, Abigail supposed to be in

4 class. Abigail is texting me.

5 THE COURT: If I said Abigail, you got to go see

6 your dad on the weekend, you -- you can control her?

7 THE DEFENDANT: Yeah.

8 THE COURT: All right.

9 THE DEFENDANT: I mean, it's the same thing.

10 THE COURT: She got to go with her --

11 THE DEFENDANT: If I got to drop the boys off --

12 THE COURT: -- dad, then.

13 THE DEFENDANT: -- I -- she should be able to come

14 to me.

15 THE COURT: Because that's not teenage discretion if

16 she completely cuts him off.

17 THE PLAINTIFF: Your Honor --

18 THE DEFENDANT: Because she's --

19 THE COURT: She got to go with her dad.

20 THE PLAINTIFF: All right.

21 THE DEFENDANT: -- got -- I haven't seen her.

22 THE COURT: I'll put her on a different schedule

23 with Dad. You want Saturday or Sunday? Take her on the --

24 THE DEFENDANT: It could be the same time, when I

1 drop them off.

2 THE COURT: Hm?

3 THE DEFENDANT: It could be the same time. I'm

4 dropping the boys off on Saturday from 10:00 to 6:00. It's --

5 THE PLAINTIFF: So you're going to -- you're --

6 you're not --

7 THE DEFENDANT: -- it's not right --

8 THE COURT: All right.

9 THE DEFENDANT: -- it's not fair to me.

10 THE COURT: Wait a minute. So the three little ones

11 would go with --

12 MR. TOTI: Judge, we -- we just --

13 THE COURT: -- Mom, and you want Abigail, reverse in

14 your household?

15 THE DEFENDANT: Yeah.

16 THE COURT: So Dad and daughter can focus on more

17 time together.

18 MR. TOTI: Judge, what is the schedule with Nadine

19 going to be? I was under the impression that we would extend

20 the --

21 THE COURT: Friday, Mom will pick up the three

22 little ones from school --

23 MR. TOTI: We extended Mom to Friday to -- to --

24 THE COURT: Right.

1 MR. TOTI: -- Monday.
2 THE PLAINTIFF: Okay.
3 THE COURT: But I got to -- I -- I'm concerned
4 Abigail is not seeing her Dad.
5 THE PLAINTIFF: Your Honor, one of the things that
6 I've talked to her --
7 THE COURT: And if Abigail -- when you're taking
8 care of the three little ones on the weekends, why can't --
9 Abigail can go with her dad so they can work on their
10 relationship?
11 THE PLAINTIFF: The issue --
12 THE COURT: And Dad will have to control her.
13 THE PLAINTIFF: True, Your Honor. The issue we're
14 having is --
15 THE COURT: Yeah. I don't have much time today,
16 ma'am --
17 THE PLAINTIFF: I'm sorry, oh, I'm sorry --
18 THE COURT: I don't want -- yeah. I don't -- I
19 don't have a crystal ball.
20 THE PLAINTIFF: No.
21 THE COURT: I'm going to -- we're going to try and
22 say Abigail, you got to do the -- go with your dad for the
23 weekend so you can work on the repair on the relationship.
24 And I can't guarantee she going to crawl out the bedroom

1 window and run away to Mom's house. Then we -- then she might
2 need individual counseling therapy, why she acting out. She's
3 acting out because you guys are going through all this --
4 MR. TOTI: So, Judge, just so there's no more issue
5 --
6 THE COURT: -- and you two have to back each other
7 up to get control of her.
8 MR. TOTI: -- Mom will have visitation with the boys
9 --
10 THE COURT: Yeah.
11 MR. TOTI: -- Friday after school until Monday to
12 school. Dad will have visitation --
13 THE COURT: Let's try it this Friday.
14 MR. TOTI: -- with the daughter Friday to Monday --
15 THE COURT: Uh-huh.
16 THE PLAINTIFF: I'm sorry. Can -- I'm sorry. The
17 only reason (indiscernible) she has practice on Saturdays.
18 THE COURT: They can have Dad Daughter time --
19 MR. TOTI: Well, Dad will have to get here there.
20 THE PLAINTIFF: Okay.
21 MR. TOTI: Dad can get her to practice.
22 THE COURT: Tell her -- you can tell her, at -- at
23 15 you're not exercising your teenage discretion. That's what
24 the Judge said.

1 MR. TOTI: And, Judge, and the holiday schedule
2 applies --

3 THE COURT: So you -- yeah. If she can't properly
4 exercise her teenage discretion and make an effort to have
5 relationships with both of you, then we'll put her on a
6 schedule. That's how it works.

7 THE PLAINTIFF: Okay.

8 MR. TOTI: Thank you, Your Honor.

9 THE COURT: All right. And he -- it's his
10 responsibility to handle her. If she's rambunctious,
11 rebellious, he's got to get control of her. But it takes you,
12 also, to support Dad in saying, what are you doing? Don't --
13 don't be like that, don't be disrespectful. Expect the same
14 in my household. We'll give it a try. All right. Who got
15 the order last time. Oh, Mr. Robbins is unbundled. Can you
16 --

17 MR. TOTI: I'll take care of it, Judge.

18 THE COURT: -- handle that, Mr. Toti?

19 MR. TOTI: Of course.

20 THE COURT: Mr. Robbins will sign off. We start
21 this Friday.

22 MR. TOTI: Yes.

23 THE COURT: Okay?

24 THE PLAINTIFF: Thank you.

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THE COURT: All right. Thank you.

(PROCEEDINGS CONCLUDED AT 9:39:24)

* * * * *

ATTEST: I do hereby certify that I have truly and
correctly transcribed the digital proceedings in the
above-entitled case to the best of my ability.

/s/ Nita Painter
Nita Painter

Steven D. Grierson

MOT

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
p 702.364.1604 f 702.364.1603
Attorney for N. Williams

DISTRICT COURT
CLARK COUNTY NEVADA

NADINE WILLIAMS

Plaintiff,

v

HERMAN GEORGE WILLIAMS

Defendant

Case D 19 586291 D
Dept I

Family Court

ORAL ARGUMENT REQUESTED

YES X NO _____

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

**PLAINTIFF'S MOTION FOR CONTEMPT
AND FOR ATTORNEY'S FEES**

Comes now, Plaintiff, Nadine Williams, by and through her counsel,
Frank J Toti Esquire, and hereby files this motion for contempt and for
attorney's fees.

1 This motion is made and based upon the pleadings and papers
2 previously on file herein, the attached exhibits, the affidavit of Nadine
3 Williams and upon such oral argument that may be adduced at the time
4 of hearing on this matter.
5

6
7 **Points and Authorities**
8

9
10 **Statement of Facts**

11 At the August 26, 2019 hearing the Court ordered that Nadine
12 would have visitation with the minor children every Saturday
13 commencing at 10.00 am and concluding at 6.00 pm. The order
14 memorializing the August 26, 2019 hearing was filed on October 30,
15 2019, and the provision regarding Nadine's visitation with the minor
16 children states specifically as follows:
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20
21 ***IT IS FURTHER ORDERED*** that Plaintiff shall have day visits with
22 the minor children every Saturday commencing at 10.00 am until 6.00
23 pm.
24

25 See Page 2, Lines 4 through 7 of the Order filed on October 30, 2019.
26
27
28

1 Herman has not abided by the terms of the October 30, 2019 Order
2 in that Herman did not deliver the minor children to Nadine for her
3
4 November 16, 2019 visitation with the minor children, Herman did not
5 deliver the minor children to Nadine for her January 4, 2020 visitation
6
7 and Herman did not deliver the minor children to Nadine for her January
8 11, 2020 visitation with the minor children. Further, while Herman
9 delivered the minor children to Nadine on December 28, 2019 for her
10 visitation with the minor children, Herman retrieved the minor children
11 at approximately 6.50 pm and Nadine was to have the minor children in
12 her care until January 6, 2020 as and for her Winter Break visitation
13 with the minor children. Further, Herman did not notify Nadine that he
14 would not be delivering the minor children to her for the three visitations
15 in question nor did Herman provide a basis as to why he would not be
16 delivering the minor children for the three visitations in question.
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18 Finally, Herman did not tell Nadine he would be retrieving the minor
19 children early during her Winter Break visitation with the minor
20 children.
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Legal Argument

a. Herman is in contempt of Court

NRS 22.010 states in pertinent part:

The following acts or omissions shall be deemed contempts:

3. Disobedience or resistance to any lawful writ, order, rule or process issued by the court or judge at chambers.

NRS 22.030 states in pertinent part:

2. if a contempt is not committed in the immediate view and presence of the court or judge at chambers, an affidavit must be presented to the court or judge of the facts constituting the contempt, or a statement of the facts by the masters or arbitrators.

NRS 22.100 states:

Upon the answer and evidence taken, the court or judge or jury, as the case may be, shall determine whether the person proceeded against is guilty of the contempt charged; and if it be found that he is guilty of the contempt, a fine may be imposed on him not exceeding \$500, or he may be imprisoned not exceeding 25 days, or both, but no imprisonment shall exceed 25 days except as provided in 22.110.

As to the issue of contempt, this matter is very straightforward. Herman ignored the orders of the Court regarding Nadine's visitation with the minor children. Nadine asks that Herman be sanctioned monetarily for his non-compliance with the orders of this Court. Nadine also asks that the Court issue a stay jail sentence upon Herman such that if Herman is in contempt of the Court's orders in the future, Herman will serve at least ten days in the Clark County Detention Center.

1 **b. Nadine is entitled to attorney's fees**

2 *NRS. 18.010*, states as follows:

- 3
4 *1. The compensation of an attorney and counselor for his services is*
5 *governed by agreement, express or implied, which is not restrained by law.*
6 *2. In addition to the cases where an allowance is authorized by specific*
7 *statue, the court may make an allowance of attorney's fees to a prevailing*
8 *party:*
9 *a. When he has not recovered more than \$20,000.00; or*
10 *b. Without regard to the recovery sought, when the court finds that the*
11 *claim, counterclaim, cross-claim, or third-party complaint or defense of*
12 *the opposing party was brought without reasonable ground or to harass*
13 *the prevailing party.*
14 *3. In awarding attorney's fees the court may pronounce its decision on the*
15 *fees at the conclusion of the trial or special proceedings without written*
16 *motion and with or without presentation of additional evidence*
17 *4. No oral application or written motion for attorney's fees alters the effect*
18 *of a final judgment rendered in the action or the time permitted for an*
19 *appeal there from.*
20 *5. Subsections 2,3, and 4 do not apply to any action arising out of a written*
21 *instrument or agreement which entitles a prevailing to an award of*
22 *reasonable attorney's fees.*

23
24 An award of attorney's fees where is warranted when the
25 nonmoving party's opposition is without reasonable ground, or to harass
26 the moving party. An award of attorney's fees is within the sound
27 discretion of the court. *County of Clark v. Richard Blanchard*
28 *Construction Company, 98 Nev. 48, 653 P.2d 1217 (1982).* In this matter
Nadine has been forced to bring this matter before the Court due to

1 Herman's inability to follow the orders of this Court. As a result, Nadine
2 should be awarded attorney's fees and requests the sum of \$3'000.00.

3
4 Pursuant to *Brunzell v. Golden Gate Nat'l Bank, 85 Nev 345 (1969)*,
5 the court should take into consideration the following factors when
6 determining an award of attorney's fees. (1) The qualities of the advocate:
7 Mr. Toti has been practicing law for approximately twenty years and is a
8 Nevada Board Certified Family Law Specialist. Approximately 98% of
9 Mr. Toti's practice is dedicated to family law. (2) The character and
10 difficulty of the work performed: The intricacy, importance, time and skill
11 required to prepare for and argue this Motion is moderate. (3) The work
12 actually performed by the attorney: Approximately six hours were spent
13 obtaining the facts, background, research and preparation of this motion
14 and it is unknown how much further work will be necessary to bring this
15 matter to conclusion. This does not account for any time spent in court.
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17 (4) The result obtained: is yet to be determined.
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Conclusion

Based on the above argument, Nadine asks for this Honorable Court to grant the following relief:

1. That Herman be held in contempt for his failure to abide by the orders of this Court.
2. That Nadine be awarded attorney's fees.
4. For such other and further relief as the Court deems appropriate.

Dated this 29 day of January, 2020



FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
Attorney for N. Williams

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Nadine Williams, being first duly sworn, upon her oath, deposes and says that:

- 8

1 4. Herman did not deliver the minor children to me for my
2 November 16, 2019 visitation with the minor children, Herman
3 did not deliver the minor children to me for my January 4, 2020
4 visitation and Herman did not deliver the minor children to me
5 for her January 11, 2020 visitation with the minor children.
6 Further, while Herman delivered the minor children to me on
7 December 28, 2019 for her visitation with the minor children,
8 Herman retrieved the minor children at approximately 6.50 pm
9 (I was to have the minor children until January 6, 2020 as and
10 for my Winter Break visitation with the minor children).
11 Herman did not inform me that he would not be providing me
12 the minor children prior to these dates and Herman since has
13 provided no basis for not providing me the minor children on
14 these dates.
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23 5. I request that Herman be sanctioned for his noncompliance with
24 the orders of the Court.
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1 6. I should also be awarded attorney's fees by the Court.
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6 
7 Nadine Williams
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11 SUBSCRIBED and SWORN to before
12 me this 29th day of January, 2020

13 
14



15 NOTARY PUBLIC in and for said County and State
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MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Nadine Williams

Plaintiff/Petitioner

v.

Herman Williams

Defendant/Respondent

Case No.

D-19-586291-D

Dept.

I

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

Notice: Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19 0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

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

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

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

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

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

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

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

Party filing Motion/Opposition:

Plaintiff

Date

1/29/2020

Signature of Party or Preparer

MR



ORDER

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
p 702.364.1604 f 702.364.1603
Attorney for N. Williams

DISTRICT COURT
CLARK COUNTY NEVADA

NADINE WILLIAMS

Plaintiff,

v

HERMAN GEORGE WILLIAMS

Defendant

Case D 19 586291 D
Dept I

Family Court

ORDER

This matter, having come on before the Court on this the
sixteenth day of December, 2019, Plaintiff, Nadine Williams,
appearing and represented by Frank J Toti Esquire and
Defendant, Herman Williams, appearing and represented by
Kenneth M. Robbins; the Court having reviewed the pleadings and
papers previously on file herein, having considered the arguments
of counsel and good cause appearing therefore:

1 **IT IS HEREBY ORDERED** that if a party does not have access
2 to the Appclose communication system, the parties shall enroll in the
3 talkingparents.com email communication program.
4

5 **IT IS FURTHER ORDERED** that the minor child, Abigail,
6 shall have teenage discretion as to her contact/visitation with both
7 parents, pending trial. However, the Court is instructing Plaintiff to
8 encourage Abigail to have contact with Defendant
9

10 **IT IS FURTHER ORDERED** that the allegations of contempt
11 are hereby deferred to the time of trial.
12

13 **IT IS FURTHER ORDERED** that due to the issue of contempt,
14 discovery is extended to January 13, 2020.
15

16 **IT IS FURTHER ORDERED** that due to Plaintiff canceling
17 the registration on the truck, Plaintiff shall pay one hundred percent of
18 the registration, and Defendant shall use the tow truck pending trial.
19 Defendant shall pay all other expenses related to the vehicle.
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IT IS FURTHER ORDERED that all other previous orders of the Court not modified at this hearing shall stand.

DATED this _____ day of JAN 28 2020, 2020

Ch. B. M.
DISTRICT COURT JUDGE

BM

Submitted by:

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
Attorney for N. Williams

Approved as to form and content by:

KENNETH M. ROBBINS 013572
732 South Sixth Street #100
Las Vegas Nevada 89101
Attorney for G. Williams



NEO

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
p 702.364.1604 f 702.364.1603
frank@fftesq.com
Attorney for Plaintiff

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

NADINE WILLIAMS,
Plaintiff,

v

HERMAN GEORGE WILLIAMS,
Defendant.

Case No. D-19-586291-D
Dept No. I

NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that an **ORDER** was entered in the above-entitled action on the 30th day of January, 2020 via the Court's E-Filing System and that a true and correct copy of this NEO and the Order was sent as follows:

Kenneth Robbins, Esq.
familyfirst@halfpricelawyers.com
Attorney for Defendant



FRANK J. TOTI, ESQ. 005804
6900 Westcliff Drive #500
Las Vegas, Nevada 89145

Steven D. Grierson

ORDR

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
p 702.364.1604 f 702.364.1603
Attorney for N. Williams

DISTRICT COURT
CLARK COUNTY NEVADA

NADINE WILLIAMS

Plaintiff,

v

HERMAN GEORGE WILLIAMS

Defendant

Case D 19 586291 D
Dept I

Family Court

ORDER

This matter, having come on before the Court on this the
sixteenth day of December, 2019, Plaintiff, Nadine Williams,
appearing and represented by Frank J Toti Esquire and
Defendant, Herman Williams, appearing and represented by
Kenneth M. Robbins; the Court having reviewed the pleadings and
papers previously on file herein, having considered the arguments
of counsel and good cause appearing therefore:

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3 talkingparents.com email communication program.
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5 **IT IS FURTHER ORDERED** that the minor child, Abigail,
6 shall have teenage discretion as to her contact/visitation with both
7 parents, pending trial. However, the Court is instructing Plaintiff to
8 encourage Abigail to have contact with Defendant
9
10

11 **IT IS FURTHER ORDERED** that the allegations of contempt
12 are hereby deferred to the time of trial.
13
14

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16 discovery is extended to January 13, 2020.
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19 the registration on the truck, Plaintiff shall pay one hundred percent of
20 the registration, and Defendant shall use the tow truck pending trial.
21 Defendant shall pay all other expenses related to the vehicle.
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IT IS FURTHER ORDERED that all other previous orders of the Court not modified at this hearing shall stand.

DATED this _____ day of JAN 28 2020, 2020

L. B. M.
DISTRICT COURT JUDGE

BM

Submitted by:

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
Attorney for N. Williams

Approved as to form and content by:

KENNETH M. ROBBINS 013572
732 South Sixth Street #100
Las Vegas Nevada 89101
Attorney for G. Williams



1 OPP
Kenneth Robbins, Esq.
2 Nevada Bar #13572
732 South 6th Street, Suite #100
3 Las Vegas, NV 89101
(702) 400-0000 Telephone
4 FamilyFirst@HalfPriceLawyers.com
"Unbundled" Attorney for Defendant

5
6 DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

7 NADINE WILLIAMS,

8 Plaintiff,

9 vs.

10 HERMAN GEORGE WILLIAMS,

11 Defendant.

)
) Case No.: D-19-586291-D
)
) Dept.: I
)
) HEARING: 3/23/20
) TIME: 9:30 A.M.
)
)

12 ORAL ARGUMENTS REQUESTED: YES

13 **OPPOSITION AND COUNTERMOTION**

14 COMES NOW, Plaintiff, Herman Williams, by and through his attorney of
15 record, Kenneth Robbins, Esq., appearing in an unbundled capacity, and does file this
16 Motion in pursuit of the following relief:

- 17 1) An Order denying the Defendant's motion for contempt.
18 2) An Order that the Defendant is not held in contempt.
19 3) An Order that the Plaintiff is held in contempt.
20 4) An Order that the Plaintiff pays for the Defendant's attorney's fees.
21 5) For such other relief, the Court deems just and proper.

22 Dated this 17 day of February, 2020

23 
24 Kenneth Robbins, Esq.

Page 1 of 13
Williams v. Williams; Case No.: D-19-586291-D
Opposition and Counter Motion

STATEMENT OF FACTS

1. Plaintiff, Nadine Williams (hereinafter known as "Nadine" or "Plaintiff"), and the Defendant, Herman Williams (hereinafter known as "Herman") were duly and lawfully married on March 3, 2004 in New York. As a result of their marriage they have four (4) minor children: Abigail Williams, born October 27, 2004, currently 15 years old; Herman Williams III, born August 24, 2008, currently 11 years old; and Matthew Williams, born May 13, 2010, currently 9 years old; and Elisha Williams, born April 26, 2013, currently 6 years old.
2. The parties appeared before the Court on August 26, 2019. The Court ordered the following:

"IT IS FURTHER ORDERED that Plaintiff shall have day visits with the minor children every Saturday commencing at 10.00 a.m. until 6.00 p.m."

"IT IS FURTHER ORDERED that parties shall follow the Department I holiday schedule. A copy of said holiday schedule is attached hereto as exhibit one and incorporated herein by reference." **See Exhibit 1.**

At the hearing the Court stated, "Put her on the default holiday schedule, for parents. And it's the easiest way to figure out what holidays, Labor Day, Thanksgiving that's all coming up. It's all there in writing, it's self explanatory. I'm going to move Mom up to day visits....we're going to move it to 8 hours a day now on Sundays. **No overnights yet until we come back at a later time.**"¹

¹ Hearing Minutes, August 26, 2019 beginning at 19:09.

1 3. On December 16, 2019, the parties appeared before the Court. The Court ordered
2 the following:

3 "IT IS FURTHER ORDERED that the minor child, Abigail, shall have teenage
4 discretion as to her contact/visitation with both parents, pending trial. However,
5 the Court is instructing Plaintiff to encourage Abigail to have contact with
6 Defendant." **See Exhibit 2.**

7 At the hearing on January 22, 2020 the Court ordered the following:

8 "IT IS FURTHER ORDERED that effective January 24, 2020 Defendant shall
9 pick-up the oldest minor child on Friday after school until Monday when he
10 delivers the oldest minor child to school. Plaintiff shall be supportive of the
11 visits."

12 "IT IS FURTHER ORDERED that the oldest minor child not have teenage
13 discretion." **See Exhibit 3.**

14 Since January 22, 2020 the Plaintiff has prevented Herman from having the
15 oldest child in his care on January 25, 2020, January 26, 2020, January 27,
16 2020, January 31, 2020, February 1, 2020, February 2, 2020, February 3, 2020,
17 February 7, 2020, February 8, 2020, February 9, 2020, February 10, 2020,
18 February 14, 2020, February 15, 2020, February 16, 2020 and February 17,
19 2020. As such, she should be found in contempt of the Court.

20 4. At the hearing on January 22, 2020 the Court ordered the following:

21 "IT IS FURTHER ORDERED that the parties can restrict the minor children's
22 access to the minor children's cellular telephones and tablets, but if the minor
23 children want to talk to the other party the minor children's cellular telephones
24 and tablets shall be returned to the minor children for that purpose."

1 On the weekend of February 15, 2020 the children were in the care of the
2 Plaintiff. The children informed Herman that the Plaintiff took away the son's
3 cell phone and he was unable to contact Herman.

4 OPPOSITION

5 **I. OPPOSITION TO ORDER TO SHOW CAUSE**

6 NRS 22.010 Acts or omissions constituting contempts. The following acts or
omissions shall be deemed contempts:

7 3. Disobedience or resistance to any lawful writ, order, rule or process
8 issued by the court or judge at chambers.

9 NRS 22.030 Summary punishment of contempt committed in immediate view
and presence of court; affidavit or statement to be filed when contempt
10 committed outside immediate view and presence of court; disqualification of
judge.

11 2. If a contempt is not committed in the immediate view and presence of
the court or judge at chambers, **an affidavit must be presented to**
12 **the court** or judge of the facts constituting contempt, or a statement of
the facts by the masters or arbitrators.

13 As stated in NRS 22.010, contempt includes acts of disobedience or resistance to
14 any lawful writ, order, rule or process issued by the Court. Any Order meant to be the
15 subject of a contempt proceeding must be clear, unambiguous, and set forth the details
16 of compliance in clear, specific terms, so the parties will know what duties or
17 obligations are imposed. *Cunningham v. District Court*, 2012 Nev. 551, 729 P.2d 1328
18 (1986). The moving party has the burden of proving that the other party has failed to
19 comply with an order from the court. *Rodriguez v. District Court*, 120 Nev. 789, 2012
20 P.3d 41 (2004). The inability of a party to obey an Order is a complete defense to
21 contempt allegations that absolve the party of any wrongdoing. *McCormick v. Sixth*
22 *Judicial District Court*, 67 Nev. 218, 326; 218 P.2d 939 (1950).

1 Plaintiff's motion should not be granted because Herman did not deliberately or
2 purposefully violate any order from the Court. As to the visit on December 28, 2019,
3 Herman did not know how to interpret the holiday schedule. The issue here is that
4 Herman was confused about the holiday visitation that he was ordered to follow on
5 August 26, 2020. At the hearing the Court explains that the Plaintiff is supposed to
6 have the children every Saturday from 10:00 a.m. until 6:00 p.m. The Court goes on to
7 explain that the parties should adhere to the Court's holiday schedule. After which the
8 Court states, "**No overnights yet until we come back at a later time.**" Herman
9 assumed that he followed the schedule in allowing her to have the beginning of the
10 holiday, but that the holiday should end at the normal visitation time since it was
11 ordered that the Plaintiff not have any overnight visits with the children.

12 Herman admits that he did not deliver the children on November 16, 2019,
13 January 4, 2020, January 11, 2020. He has a reasonable explanation as to why it was he
14 could not deliver the children to her. On November 9, 2019 the children went to the
15 Plaintiff's home for their visit as scheduled. When there their youngest child, Elisha,
16 got sick with a stomach virus. Herman took the child to the doctor on November 11,
17 2019. The doctor prescribed the child with medication to help him fight the stomach
18 virus. When November 16, 2020 came around the child was still sick despite being on
19 medication the entire week. Herman told the Plaintiff that the children could not come
20 to the visit because Elisha was too ill.

21 On December 28, 2019 Herman took the children to the Plaintiff's home for
22 their regular visit. When it came time to pick-up the children the Plaintiff would not
23 release them. Herman was forced to call the police in order to retrieve the minor
24 children. The Plaintiff made comments which made Herman afraid that she would keep

1 the children longer on their next visit. Thus, Herman did not deliver the children to the
2 Plaintiff on January 4, 2020 or January 11, 2020 because he feared that the Plaintiff
3 would not return the children to him.

4 Herman did not purposefully or deliberately violate a court order because he did
5 not understand the holiday schedule on December 28, 2019; and it was in the best
6 interest of the children for him to not to deliver the children to the care of the Plaintiff
7 on November 16, 2019, January 4, 2020, January 11, 2020. Thus, he should not be
8 held in contempt of the Court.

9 COUNTERMOTION

10 **I. ORDER TO SHOW CAUSE**

11 NRS 22.010 Acts or omissions constituting contempts. The following acts or
omissions shall be deemed contempts:

12 3. Disobedience or resistance to any lawful writ, order, rule or process
issued by the court or judge at chambers.

13 NRS 22.030 Summary punishment of contempt committed in immediate view
14 and presence of court; affidavit or statement to be filed when contempt
committed outside immediate view and presence of court; disqualification of
15 judge.

16 2. If a contempt is not committed in the immediate view and presence of
the court or judge at chambers, **an affidavit must be presented to**
17 **the court** or judge of the facts constituting contempt, or a statement of
the facts by the masters or arbitrators.

18 As stated in NRS 22.010, contempt includes acts of disobedience or resistance to
19 any lawful writ, order, rule or process issued by the Court. Any Order meant to be the
20 subject of a contempt proceeding must be clear, unambiguous, and set forth the details
21 of compliance in clear, specific terms, so the parties will know what duties or
22 obligations are imposed. *Cunningham v. District Court*, 2012 Nev. 551, 729 P.2d 1328
23 (1986). The moving party has the burden of proving that the other party has failed to
24

1 comply with an order from the court. *Rodriguez v. District Court*, 120 Nev. 789, 2012
2 P.3d 41 (2004). The inability of a party to obey an Order is a complete defense to
3 contempt allegations that absolve the party of any wrongdoing. *McCormick v. Sixth*
4 *Judicial District Court*, 67 Nev. 218, 326; 218 P.2d 939 (1950).

5 Here, NRS 22.030(2) requires Herman's Motion for an Order to show Cause be
6 accompanied with a detailed and fact driven affidavit that details the acts of the
7 Plaintiff that warrant contempt. Herman has attached a detailed affidavit to the end of
8 this document.

9 On January 22, 2020, the Court ordered the following: "IT IS FURTHER
10 ORDERED that effective January 24, 2020, Defendant shall pick-up the oldest minor
11 child on Friday after school until Monday when he delivers the oldest minor child to
12 school. Plaintiff shall be supportive of the visits. ... IT IS FURTHER ORDERED that
13 the oldest minor child not have teenage discretion." **See Exhibit 3.**

14 Additionally, Defendant's motion should be granted because the Plaintiff has
15 disrupted Herman's ability to care for their children, especially their daughter. Plaintiff
16 got the children the weekend of Abigail's birthday/Nevada day. She then decided to
17 keep the children the entire weekend, despite the fact that she was not authorized to
18 have overnights with the children. Herman went to get the children on November 29,
19 2019. The Plaintiff refused to release their daughter and simply told him that she has
20 teenage discretion to make her own decisions. While she had teenage discretion, the
21 Plaintiff encouraged her to stay at her home.

22 Abigail returned to Herman's home following the January 22, 2020 hearing,
23 however, he has not seen her since January 24, 2020. Herman had the child in his care
24 and went to sleep. He awoke to find out that the child had packed all of her clothing

1 and personal belongings. Additionally, he discovered that the child stole \$1,500.00
2 from him. When Herman informed Plaintiff that he wanted to call the police to report
3 the child missing, Plaintiff told Herman that she knew where Abigail was and that she
4 wasn't missing. The child has been at the home of the Plaintiff since. As such he has
5 missed his scheduled visitation time with the child on January 25, 2020, January 26,
6 2020, January 27, 2020, January 31, 2020, February 1, 2020, February 2, 2020,
7 February 3, 2020, February 7, 2020, February 8, 2020, February 9, 2020, February 10,
8 2020, February 14, 2020, February 15, 2020, February 16, 2020 and February 17,
9 2020. When Herman calls the Plaintiff to speak to the child the Plaintiff generally does
10 not pick-up or she is heard telling the children to not to pick-up his calls. She has
11 blocked Herman from receiving calls from the school which notify him when Abigail is
12 cutting school. Additionally, she has said that the child has discretion to visit with
13 Herman.

14 The Plaintiff has encouraged her to not to go to Herman's home. She is allowing
15 the child to smoke marijuana and cut school in her care. The child is not an adult and
16 the Court must intervene to do what is in the best interest of the child. Clearly it is in
17 her best interest to be in in the care of Herman. Teenage discretion will not work
18 because the Plaintiff incentivizes the child to avoid Herman by allowing her to have no
19 rules or responsibilities in her home.

20 Additionally, the Plaintiff has violated the order that the children can
21 communicate with Herman via their cell phone on the weekend of February 15, 2020.
22 During the weekend Herman was unable to communicate with their son. Herman
23 learned that the Plaintiff took away the cell phone of the child and would not let him
24 use it despite his request to contact Herman.

1 The Plaintiff has violated the Court's orders for Herman to have Abigail in his
2 care and the ability to communicate with the children on their cell phones. Her actions
3 have been deliberate and purposeful and without any justification. As such, she should
4 be held in contempt of the Court.

5 II. ATTORNEY'S FEES

6 NRS 18.010 provides as follows:

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

- 10 (a) When he has not recovered more than \$20,000.00; or
11 (b) Without regard to the recovery sought, when the court finds that
12 the claim, counterclaim, cross-claim or third party complaint or defense of
13 the opposing party was brought without reasonable ground or to harass the
14 prevailing party.

15 NRS 125.150(3). Except as otherwise provided in NRS 125.141, whether or not
16 application for suit money has been made under the provisions of NRS 125.040, the
17 court may award a reasonable attorney's fee to either party to an action for divorce if
18 those fees are in issue under the pleadings.

19 Herman is entitled to attorney's fees. Herman would not have had to hire a
20 lawyer if the Plaintiff did not submit a motion which conveniently does not mention
21 facts that explain why it was in the best interest of the children for him to keep the
22 children out of her care. Additionally, the Plaintiff has been the party that has been
23 withholding the children.

24 With specific reference to Family Law matters, the Supreme Court has recently
adopted "well known basic elements," which in addition to hourly time schedules kept
by the attorney, are to be considered in determining the reasonable value of an
attorney's services, qualities, commonly known as the *Brunzell* factors:

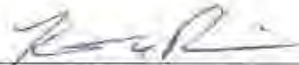
In applying the *Brunzell* factors to the present case, we respectfully submit that
the qualities of Herman's attorney have been shaped by his education and experience.

1 More specifically, Herman's attorney holds a J.D. and he is a licensed attorney in good
2 standing with the State of Nevada. As to the character and quality of the work
3 performed, we believe that all the filings submitted on behalf of our client by this
4 office are adequate, both factually and legally. Considering the foregoing, Herman
5 respectfully request an award of her attorney's fees and costs in the amount of
6 \$1,500.00.

7 **III. CONCLUSION**

- 8 1) An Order denying the Defendant's motion for contempt.
9 2) An Order that the Defendant is not held in contempt.
10 3) An Order that the Plaintiff is held in contempt.
11 4) An Order that the Plaintiff pays for the Defendant's attorney's fees.
12 5) For such other relief, the Court deems just and proper.

13
14 Dated this 17 day of FEBRUARY, 2020.

15 
16 Kenneth Robbins, Esq.
17 Nevada Bar No.: 13572
"Unbundled" Attorney for Defendant
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19
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1 **AFFIDAVIT OF HERMAN WILLIAMS IN SUPPORT OF THE**
2 **DEFENDANT'S OPPOSITION AND COUNTERMOTION**

3 State of NEVADA)
4 County of CLARK) ss:

5 Herman Williams, first being duly sworn, deposes and states:

- 6 1. I am the Defendant named in the above-entitled case. I make this Affidavit in
7 support of the DEFENDANT'S OPPOSITION AND COUNTERMOTION. The
8 following statements are being made upon my personal knowledge of the
9 matters set forth herein, and if called as a witness, I would testify competently
10 thereto.
- 11 2. I, Herman Williams, attest that the Plaintiff kept the children from me the entire
12 weekend of Nevada day/Abigail's birthday.
- 13 I, Herman Williams, attest that Abigail has been at the home of the Plaintiff
14 since January 24/25, 2020. As such I have missed visitation time with the child
15 on the following dates: January 25, 2020, January 26, 2020, January 27, 2020,
16 January 31, 2020, February 1, 2020, February 2, 2020, February 3, 2020,
17 February 7, 2020, February 8, 2020, February 9, 2020, February 10, 2020,
18 February 14, 2020, February 15, 2020, February 16, 2020 and February 17,
19 2020. I have missed these visitation dates because of the Plaintiff's actions, as
20 she is housing the child and she encouraged her to miss the visit. Additionally,
21 the Plaintiff has blocked me from getting notifications from her school. I believe
22 that this is in violation of the Court's order from January 22, 2020 which the
23 Court ordered: "IT IS FURTHER ORDERED that effective January 24, 2020
24

1 Defendant shall pick-up the oldest minor child on Friday after school until
2 Monday when he delivers the oldest minor child to school. Plaintiff shall be
3 supportive of the visits. "... IT IS FURTHER ORDERED that the oldest minor
4 child not have teenage discretion." **See Exhibit 3.**

5 3. I, Herman Williams, attest that I did not take the children to the Plaintiff's on
6 November 16, 2020 because Elisha was sick.

7 4. I, Herman Williams, attest that I did not take the children to the Plaintiff's home
8 on January 4, 2020 and January 11, 2020 because of the incident on December
9 28, 2019. On December 28, 2019 the Plaintiff claimed that I would not see the
10 children again and tried to withhold them. I had to call the cops to get them
11 back. I was fearful that it would happen again and did not want to put the
12 children through the scenario again.

13 I, Herman Williams, attest that on the weekend of February 15, 2020 the
14 Plaintiff took our sons cell phone from him and I was unable to communicate
15 with him. I believe that this is in violation of the order from January 22, 2020
16 which states, "IT IS FURTHER ORDERED that the parties can restrict the minor
17 children's access to the minor children's cellular telephones and tablets, but if
18 the minor children want to talk to the other party the minor children's cellular
19 telephones and tablets shall be returned to the minor children for that purpose."

20 //

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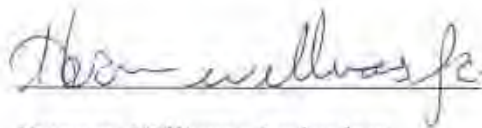
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1 5. I, Herman Williams, declare, under penalties of perjury, that I have read the
2 **OPPOSITION AND COUNTERMOTION** and know the contents thereof;
3 and that the same is true of my own knowledge, except those matters therein
4 contained stated upon information and belief and as to those matters, I believe
5 them to be true and correct.

6 Executed this 17 day of February, 2020.

7
8 

9 Herman Williams, Defendant

10
11 SUBSCRIBED AND SWORN to before

12 me this 17th day of February, 2020.

13 

14 NOTARY PUBLIC in and for

15 said County of Clark and State of Nevada.
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MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Nadine Williams

Plaintiff/Petitioner

v.

Herman George Williams

Defendant/Respondent

Case No. D-19-586291-D

Dept. 1

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

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

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

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

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

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

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

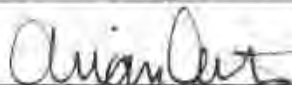
The total filing fee for the motion/opposition I am filing with this form is:

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

Party filing Motion/Opposition: Herman George Williams

Date 02/17/2020

Signature of Party or Preparer





1 Kenneth Robbins, Esq.
2 Nevada Bar No. 13572
3 732 South 6th Street, Suite #100
4 Las Vegas, NV 89101
5 (702) 400-0000 Telephone
6 FamilyFirst@HalfPriceLawyers.com
7 "Unbundled" Attorney for Plaintiff

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DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

NADINE WILLIAMS,)	Case No.: D-19-586291-D
)	
Plaintiff,)	Dept.: I
)	
vs.)	
)	
HERMAN GEORGE WILLIAMS,)	
)	
Defendant.)	

EXHIBITS IN SUPPORT OF DEFENDANT'S OPPOSITION & COUNTERMOTION

COMES NOW, Defendant, Herman Williams, by and through his attorney of record, Kenneth M. Robbins, Esq., and hereby submits his Exhibits in Support of Defendant's Opposition & Countermotion as follows:

Exhibit 1 – Order from August 26, 2019.

Exhibit 2 – Order from December 16, 2019

Exhibit 3 – Order from January 22, 2020.

Dated this 17 day of February, 2020

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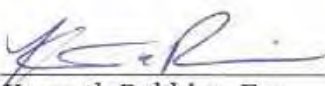

Kenneth Robbins, Esq.
Nevada Bar No.: 13572
"Unbundled" Attorney for Plaintiff

EXHIBIT 1

EXHIBIT 1



1 **ORDER**
2 FRANK J TOTI 005804
3 6900 Westcliff Drive #500
4 Las Vegas Nevada 89145
5 p 702.364.1604 f 702.364.1603
6 Attorney for N. Williams

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DISTRICT COURT
CLARK COUNTY NEVADA

NADINE WILLIAMS
Plaintiff,

v

HERMAN GEORGE WILLIAMS
Defendant

} Case D 19 586291 D
} Dept I
} Family Court

ORDER

This matter, having come on before the Court on this the
sixteenth day of December, 2019, Plaintiff, Nadine Williams,
appearing and represented by Frank J Toti Esquire and
Defendant, Herman Williams, appearing and represented by
Kenneth M. Robbins; the Court having reviewed the pleadings and
papers previously on file herein, having considered the arguments
of counsel and good cause appearing therefore:

1 **IT IS HEREBY ORDERED** that if a party does not have access
2 to the Appclose communication system, the parties shall enroll in the
3 talkingparents.com email communication program.
4

5 **IT IS FURTHER ORDERED** that the minor child, Abigail,
6 shall have teenage discretion as to her contact/visitation with both
7 parents, pending trial. However, the Court is instructing Plaintiff to
8 encourage Abigail to have contact with Defendant
9
10

11 **IT IS FURTHER ORDERED** that the allegations of contempt
12 are hereby deferred to the time of trial.
13
14

15 **IT IS FURTHER ORDERED** that due to the issue of contempt,
16 discovery is extended to January 13, 2020.
17

18 **IT IS FURTHER ORDERED** that due to Plaintiff canceling
19 the registration on the truck, Plaintiff shall pay one hundred percent of
20 the registration, and Defendant shall use the tow truck pending trial.
21 Defendant shall pay all other expenses related to the vehicle.
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IT IS FURTHER ORDERED that all other previous orders of the Court not modified at this hearing shall stand.

DATED this _____ day of JAN 28 2020, 2020

Shirley B. Moore
DISTRICT COURT JUDGE

BM

Submitted by:

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
Attorney for N. Williams

Approved as to form and content by:

KENNETH M. ROBBINS 013572
732 South Sixth Street #100
Las Vegas Nevada 89101
Attorney for G. Williams

EXHIBIT 2

EXHIBIT 2

Steven D. Grierson

1 **ORDER**
2 FRANK J TOTI 005804
3 6900 Westcliff Drive #500
4 Las Vegas Nevada 89145
5 p 702.364.1604 f 702.364.1603
6 Attorney for N. Williams

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**DISTRICT COURT
CLARK COUNTY NEVADA**

NADINE WILLIAMS
Plaintiff,

v

HERMAN GEORGE WILLIAMS
Defendant

} Case D 19 586291 D
} Dept I
} Family Court

ORDER

This matter, having come on before the Court on this the
sixteenth day of December, 2019, Plaintiff, Nadine Williams,
appearing and represented by Frank J Toti Esquire and
Defendant, Herman Williams, appearing and represented by
Kenneth M. Robbins; the Court having reviewed the pleadings and
papers previously on file herein, having considered the arguments
of counsel and good cause appearing therefore:

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2 to the Appclose communication system, the parties shall enroll in the
3 talkingparents.com email communication program.
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6 shall have teenage discretion as to her contact/visitation with both
7 parents, pending trial. However, the Court is instructing Plaintiff to
8 encourage Abigail to have contact with Defendant.
9
10

11 **IT IS FURTHER ORDERED** that the allegations of contempt
12 are hereby deferred to the time of trial.
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16 discovery is extended to January 13, 2020.
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19 the registration on the truck, Plaintiff shall pay one hundred percent of
20 the registration, and Defendant shall use the tow truck pending trial.
21 Defendant shall pay all other expenses related to the vehicle.
22
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1 IT IS FURTHER ORDERED that all other previous orders of
2 the Court not modified at this hearing shall stand.
3

4
5 DATED this _____ day of JAN 28 2020, 2020
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9
10 
11 DISTRICT COURT JUDGE
12 BM

13
14 Submitted by:

15 
16
17 FRANK J TOTI 005804
18 6900 Westcliff Drive #500
19 Las Vegas Nevada 89145
20 Attorney for N. Williams
21
22
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25
26
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Approved as to form and content by:

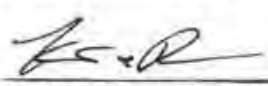

KENNETH M. ROBBINS 013572
732 South Sixth Street #100
Las Vegas Nevada 89101
Attorney for G. Williams

EXHIBIT 3

EXHIBIT 3

1 **ORDR**

2 FRANK J TOTI 005804
3 6900 Westcliff Drive #500
4 Las Vegas Nevada 89145
5 p 702.364.1604 f 702.364.1603
6 Attorney for N. Williams

7 DISTRICT COURT
8 CLARK COUNTY NEVADA

9 NADINE WILLIAMS

10 Plaintiff,

11 v

12 HERMAN GEORGE WILLIAMS

13 Defendant

Case D 19 586291 D
Dept I
Family Court

14 **ORDER**

15 This matter, having come on before the Court on this the
16 twenty-second day of January, 2020, Plaintiff, Nadine Williams,
17 appearing and represented by Frank J Toti Esquire and
18 Defendant, Herman Williams, appearing and represented by
19 Kenneth M. Robbins; the Court having reviewed the pleadings and
20 papers previously on file herein, having considered the arguments
21 of counsel and good cause appearing therefore:

1 **IT IS HEREBY ORDERED** that effective January 24, 2020,
2 Plaintiff shall pick-up the three youngest minor children on Friday after
3 school until Monday when she delivers the three youngest minor
4 children to school.
5

6 **IT IS FURTHER ORDERED** that effective January 24, 2020,
7 Defendant shall pick-up the oldest minor child on Friday after school
8 until Monday when he delivers the oldest minor child to school.
9 Plaintiff shall be supportive of the visits.
10

11 **IT IS FURTHER ORDERED** that the oldest minor child not
12 have teenage discretion.
13

14 **IT IS FURTHER ORDERED** that there shall be no corporal
15 punishment or discipline of the minor children in either party's
16 household.
17

18 **IT IS FURTHER ORDERED** that the parties shall file follow
19 the Department 1 holiday schedule.
20

21 **IT IS FURTHER ORDERED** that the parties can restrict the
22 minor children's access to the minor children's cellular telephones and
23 tablets, but if the minor children want to talk to the other party the
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1 minor children's cellular telephones and tablets shall be returned to the
2 minor children for that purpose.

3
4 **IT IS FURTHER ORDERED** that Defendant shall be seen by
5 Donna Gosnell to improve his relationship with the oldest minor child
6 and Plaintiff shall be seen by Donna Gosnell to work on her relationship
7 with the three youngest minor children.
8

9
10 **IT IS FURTHER ORDERED** that the parties shall not allow the
11 oldest minor child to drive an automobile unless she has the
12 appropriate permit or license.
13

14 **IT IS FURTHER ORDERED** that the truck's registration will be
15 provided Defendant's attorney's office by January 24, 2020.
16

17 **IT IS FURTHER ORDERED** that the parties are referred to the
18 Family Mediation Center for child interviews, and the interviews shall
19 occur on January 29, 2020 at 4.00 pm. Fifty percent of the fees are
20 waived for both parties.
21
22

23 **IT IS FURTHER ORDERED** that Pre-Trial Memorandums
24 along with the final List of Witnesses and List of Exhibits are due on or
25 before the close of business on May 20, 2020.
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IT IS FURTHER ORDERED that the Evidentiary Hearing in this matter is now set for June 9, 2020 at 1.30 pm.


DATED this _____ day of _____, 2020

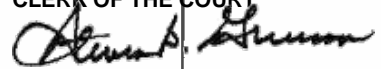
DISTRICT COURT JUDGE

Submitted by:

Approved as to form and content by:

FRANK J TOTI 005804
6900 Westcliff Drive #500
Las Vegas Nevada 89145
Attorney for N. Williams


KENNETH M. ROBBINS 013572
732 South Sixth Street #100
Las Vegas Nevada 89101
Attorney for G. Williams



1 **ORDR**
2 FRANK J TOTI 005804
3 6900 Westcliff Drive #500
4 Las Vegas Nevada 89145
5 p 702.364.1604 f 702.364.1603
6 Attorney for N. Williams
7
8
9

6 DISTRICT COURT
7 CLARK COUNTY NEVADA
8

9 NADINE WILLIAMS
10 Plaintiff,
11

} Case D 19 586291 D
} Dept I
} Family Court

12 v
13

14 HERMAN GEORGE WILLIAMS
15 Defendant
16

17
18 **ORDER**
19

20 This matter, having come on before the Court on this the
21 twenty-second day of January, 2020, Plaintiff, Nadine Williams,
22 appearing and represented by Frank J Toti Esquire and
23 Defendant, Herman Williams, appearing and represented by
24 Kenneth M. Robbins; the Court having reviewed the pleadings and
25 papers previously on file herein, having considered the arguments
26
27 of counsel and good cause appearing therefore:
28

RECEIVED

FEB 18 2020

DEPT. I

1 **IT IS HEREBY ORDERED** that effective January 24, 2020,
2 Plaintiff shall pick-up the three youngest minor children on Friday after
3 school until Monday when she delivers the three youngest minor
4 children to school.
5

6 **IT IS FURTHER ORDERED** that effective January 24, 2020,
7 Defendant shall pick-up the oldest minor child on Friday after school
8 until Monday when he delivers the oldest minor child to school.
9 Plaintiff shall be supportive of the visits.
10

11 **IT IS FURTHER ORDERED** that the oldest minor child not
12 have teenage discretion.
13

14 **IT IS FURTHER ORDERED** that there shall be no corporal
15 punishment or discipline of the minor children in either party's
16 household.
17

18 **IT IS FURTHER ORDERED** that the parties shall file follow
19 the Department I holiday schedule.
20

21 **IT IS FURTHER ORDERED** that the parties can restrict the
22 minor children's access to the minor children's cellular telephones and
23 tablets, but if the minor children want to talk to the other party the
24
25
26
27
28

1 minor children's cellular telephones and tablets shall be returned to the
2 minor children for that purpose.

3
4 **IT IS FURTHER ORDERED** that Defendant shall be seen by
5 Donna Gosnell to improve his relationship with the oldest minor child
6 and Plaintiff shall be seen by Donna Gosnell to work on her relationship
7 with the three youngest minor children.
8

9
10 **IT IS FURTHER ORDERED** that the parties shall not allow the
11 oldest minor child to drive an automobile unless she has the
12 appropriate permit or license.
13


14 **IT IS FURTHER ORDERED** that the truck's registration will be
15 provided Defendant's attorney's office by January 24, 2020.
16

17 **IT IS FURTHER ORDERED** that the parties are referred to the
18 Family Mediation Center for child interviews, and the interviews shall
19 occur on January 29, 2020 at 4.00 pm. Fifty percent of the fees are
20 waived for both parties.
21
22

23 **IT IS FURTHER ORDERED** that Pre-Trial Memorandums
24 along with the final List of Witnesses and List of Exhibits are due on or
25 before the close of business on May 20, 2020.
26
27
28

1 IT IS FURTHER ORDERED that the Evidentiary Hearing in
2 this matter is now set for June 9, 2020 at 1.30 pm.
3


4 FEB 19 2020
5 DATED this _____ day of _____, 2020
6

7
8 
9


10 DISTRICT COURT JUDGE
11

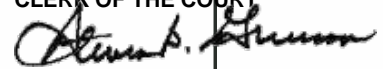
12 CHERYL B. MOSS
13
14
15

16 Submitted by:

17 
18
19 FRANK J TOTI 005804
20 6900 Westcliff Drive #500
21 Las Vegas Nevada 89145
22 Attorney for N. Williams
23
24
25
26
27
28

Approved as to form and content by:


KENNETH M. ROBBINS 013572
732 South Sixth Street #100
Las Vegas Nevada 89101
Attorney for G. Williams



1 **NEO**
2 FRANK J TOTI 005804
3 6900 Westcliff Drive #500
4 Las Vegas Nevada 89145
5 p 702.364.1604 f 702.364.1603
6 frank@fjtesq.com
7 Attorney for Plaintiff

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

10 NADINE WILLIAMS,
11 Plaintiff,

12 v

13 HERMAN GEORGE WILLIAMS,
14 Defendant.

} Case No. D-19-586291-D
} Dept No. I

15 **NOTICE OF ENTRY OF ORDER**

16 **PLEASE TAKE NOTICE** that an **ORDER** was entered in the above-
17 entitled action on the 21st day of February, 2020 via the Court's E-Filing System
18 and that a true and correct copy of this NEO and the Order was sent as follows:

19 Kenneth Robbins, Esq.
20 familyfirst@halfpricelawyers.com
21 Attorney for Defendant



22 FRANK J. TOTI, ESQ. 005804
23 6900 Westcliff Drive #500
24 Las Vegas, Nevada 89145
25
26
27
28

Steven D. Grierson

1 **ORDR**

2 FRANK J TOTI 005804
3 6900 Westcliff Drive #500
4 Las Vegas Nevada 89145
5 p 702.364.1604 f 702.364.1603
6 Attorney for N. Williams

7 **DISTRICT COURT**
8 **CLARK COUNTY NEVADA**

9 **NADINE WILLIAMS**

10 Plaintiff,

11 v

12 **HERMAN GEORGE WILLIAMS**

13 Defendant

Case D 19 586291 D
Dept I
Family Court

14 **ORDER**

15 This matter, having come on before the Court on this the
16 twenty-second day of January, 2020, Plaintiff, Nadine Williams,
17 appearing and represented by Frank J Toti Esquire and
18 Defendant, Herman Williams, appearing and represented by
19 Kenneth M. Robbins; the Court having reviewed the pleadings and
20 papers previously on file herein, having considered the arguments
21 of counsel and good cause appearing therefore:

22 **RECEIVED**

23 **FEB 18 2020**

24 **DEPT. I**

1 **IT IS HEREBY ORDERED** that effective January 24, 2020,
2 Plaintiff shall pick-up the three youngest minor children on Friday after
3 school until Monday when she delivers the three youngest minor
4 children to school.
5

6 **IT IS FURTHER ORDERED** that effective January 24, 2020,
7 Defendant shall pick-up the oldest minor child on Friday after school
8 until Monday when he delivers the oldest minor child to school.
9
10 Plaintiff shall be supportive of the visits.
11

12 **IT IS FURTHER ORDERED** that the oldest minor child not
13 have teenage discretion.
14

15 **IT IS FURTHER ORDERED** that there shall be no corporal
16 punishment or discipline of the minor children in either party's
17 household.
18
19

20 **IT IS FURTHER ORDERED** that the parties shall file follow
21 the Department I holiday schedule.
22

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24 minor children's access to the minor children's cellular telephones and
25 tablets, but if the minor children want to talk to the other party the
26
27
28

1 minor children's cellular telephones and tablets shall be returned to the
2 minor children for that purpose.

3
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5 Donna Gosnell to improve his relationship with the oldest minor child
6 and Plaintiff shall be seen by Donna Gosnell to work on her relationship
7 with the three youngest minor children.
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10 **IT IS FURTHER ORDERED** that the parties shall not allow the
11 oldest minor child to drive an automobile unless she has the
12 appropriate permit or license.
13

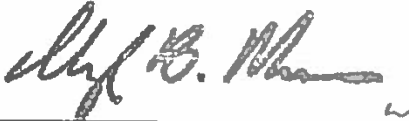
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16

17 **IT IS FURTHER ORDERED** that the parties are referred to the
18 Family Mediation Center for child interviews, and the interviews shall
19 occur on January 29, 2020 at 4.00 pm. Fifty percent of the fees are
20 waived for both parties.
21
22

23 **IT IS FURTHER ORDERED** that Pre-Trial Memorandums
24 along with the final List of Witnesses and List of Exhibits are due on or
25 before the close of business on May 20, 2020.
26
27
28

1 IT IS FURTHER ORDERED that the Evidentiary Hearing in
2 this matter is now set for June 9, 2020 at 1.30 pm.
3

4
5 DATED this _____ day of FEB 19 2020
6 _____, 2020
7


8
9
10 
11 DISTRICT COURT JUDGE


12 CHERYL B. MOSS
13
14
15

16 Submitted by:

17 
18
19 FRANK J TOTI 005804
20 6900 Westcliff Drive #500
21 Las Vegas Nevada 89145
22 Attorney for N. Williams
23
24
25
26
27
28

Approved as to form and content by:


KENNETH M. ROBBINS 013572
732 South Sixth Street #100
Las Vegas Nevada 89101
Attorney for G. Williams



1 NEO

2
3
4
5 **DISTRICT COURT**
6 **CLARK COUNTY, NEVADA**

7 * * *

8 Nadine Alecia Williams, Plaintiff
9 vs.
10 Herman George Williams,
11 Defendant.

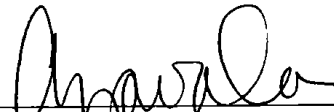
Case No: D-19-586291-D
Department I

12
13 **NOTICE OF ENTRY OF MARCH 19, 2020 MINUTE ORDER**

14 TO ALL INTERESTED PARTIES:

15
16 **PLEASE TAKE NOTICE** that a Minute Order was entered in the above-
17 entitled matter on the March 19, 2020 a true and correct copy of which is attached
18 hereto.

19
20
21 Dated: March 19, 2020



22
23 Suzanna Zavala,
24 Judicial Executive Assistant to the
25 HONORABLE Cheryl B. Moss
26
27
28

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CERTIFICATE OF SERVICE

I hereby certify that on the above file stamp date:

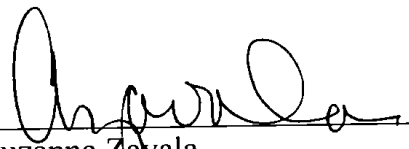
☒ I placed a copy of the foregoing NOTICE OF ENTRY OF ORDER in
the appropriate attorney folder located in the Clerk of the Court's Office of:

FRANK J. TOTI, ESQ.

6900 Westcliff Drive, Suite 500
Las Vegas, NV 89145
frank@fjtesq.com
Attorney for Plaintiff

KENNETH M. ROBBINS, ESQ.

732 South Sixth Street, Suite 100
Las Vegas, NV 89101
familyfirst@halfpricelawyers.com
Unbundled Attorney for Defendant


Suzanna Zavala,
Judicial Executive Assistant to the
HONORABLE Cheryl B. Moss

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Divorce - Complaint**COURT MINUTES****March 19, 2020**

D-19-586291-D Nadine Alecia Williams, Plaintiff
vs.
Herman George Williams, Defendant.

March 19, 2020 7:00 AM Minute Order

HEARD BY: Moss, Cheryl B.**COURTROOM:** Courtroom 13**COURT CLERK:** Erica Jimenez**PARTIES:**

Abigail Williams, Subject Minor, not present
Elisha Williams, Subject Minor, not present
Herman Williams, Defendant, Counter Pro Se
Claimant, not present
Herman Williams, Subject Minor, not present
Kenneth Robbins, Attorney, Unbundled
Attorney, not present
Matthew Williams, Subject Minor, not present
Nadine Williams, Plaintiff, Counter Frank Toti, Attorney, not present
Defendant, not present

JOURNAL ENTRIES

- COURT MINUTE ORDER

NRCP 1 and EDCR 1.10 state that the procedures in district court shall be administered to secure efficient, just, and inexpensive determinations in every action and proceeding.

EDCR 2.23(c) state that the judge may consider the motion on its merits at any time with or without oral argument, and grant or deny it.

On January 29, 2020 Plaintiff/Mother filed a Motion for Contempt and for Attorney s Fees

PRINT DATE:	03/19/2020	Page 1 of 3	Minutes Date:	March 19, 2020
-------------	------------	-------------	---------------	----------------

Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

On February 17, 2020 Defendant/Father filed an Opposition and Countermotion for Contempt and Attorney's Fees.

Upon review of the pleadings and exhibits, Mother's Motion is GRANTED to the extent that her counsel shall submit a DETAILED Order Show Cause referencing the order, file date, page number, and line number, along with a DETAILED AFFIDAVIT in support of the OSC listing the COUNTS of contempt. The contempt issues shall be heard at the trial on June 9, 2020 wherein the court will hear testimony and review any exhibits relating to contempt.

COURT FURTHER FINDS that Father's Countermotion is GRANTED to the extent that her counsel shall submit a DETAILED Order Show Cause referencing the order, file date, page number, and line number, along with a DETAILED AFFIDAVIT in support of the OSC listing the COUNTS of contempt. The contempt issues shall also be heard at the trial on June 9, 2020 wherein the court will hear testimony and review any exhibits relating to contempt.

FURTHER ORDERED that the Court CLARIFIES its temporary Order with respect to holiday visitation for Mother. Mother shall have her allotted time in the Default Holiday Schedule but NO OVERNIGHTS. If Mother, for example, has Spring Break, she has the children EVERY DAY FOR DAY VISITS ONLY during her timeshare. That means the children will be dropped off in the morning and picked up in the evening from 8AM to 6PM during Mother's assigned holiday/vacation.

Both counsel shall submit their proposed OSC and Affidavit in Support of OSC electronically to the Court's JEA email due to current court policy.

The COURT ORDERS that the hearing set for MARCH 23, 2020 shall be VACATED.

Attorney's fees and costs are DEFERRED to trial.

A copy of this minute order shall be served upon the parties.

SO ORDERED.

INTERIM CONDITIONS:

PRINT DATE:	03/19/2020	Page 2 of 3	Minutes Date:	March 19, 2020
-------------	------------	-------------	---------------	----------------

Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

FUTURE HEARINGS:

Canceled: March 23, 2020 9:30 AM Motion

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - per Judge

Moss, Cheryl B.

Courtroom 13

Jimenez, Erica

Canceled: March 23, 2020 9:30 AM Opposition & Countermotion

Reason: Canceled as the result of a hearing cancel, Hearing Canceled Reason: Vacated - per Judge

Moss, Cheryl B.

Courtroom 13

Jimenez, Erica

June 09, 2020 1:30 PM Non-Jury Trial

Moss, Cheryl B.

Courtroom 13

Jimenez, Erica

PRINT DATE:	03/19/2020	Page 3 of 3	Minutes Date:	March 19, 2020
-------------	------------	-------------	---------------	----------------

Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

Steven D. Grierson

1 SAO
Kenneth M. Robbins, Esq.
2 Nevada Bar No. 13572
732 South 6th Street, Suite #100
3 Las Vegas, NV 89101
(702) 400-0000 Telephone
4 (702) 425-1156 Facsimile
FamilyFirst@HalfPriceLawyers.com
5 "Unbundled" Attorney for Defendant

6 DISTRICT COURT
FAMILY DIVISION
7 CLARK COUNTY, NEVADA

8 NADINE WILLIAMS,

9 Plaintiff

10 vs.

11 HERMAN GEORGE
12 WILLIAMS,

13 Defendant.

)
) Case No.: D-19-586291-D
) Dept.: I
)

STIPULATION AND ORDER
TO CONTINUE EVIDENTIARY
HEARING SCHEDULED FOR
June 9, 2020

14 COMES NOW, Defendant, Herman Williams by and through her attorney of
15 record, Kenneth M. Robbins, Esq., appearing in an unbundled capacity, and Plaintiff,
16 Nadine Williams, by and through her attorney of record, Frank Tori, Esq., the following:

17 **IT IS HEREBY STIPULATED** that the Evidentiary Hearing scheduled for June
18 9, 2020 at 1:30 p.m., shall be continued for a period of ninety (90) days to the Court's
19 next trial setting due to Administrative Order 20-11, dated March 25, 2020 and
20 Administrative Order 20-13 dated April 17, 2020.


21 ///

22 ///

23 ///

24

Submitted this 2 day of June,
2020.


KENNETH M. ROBBINS, ESQ.
HALF PRICE LAWYERS
Nevada Bar No.: 13572
732 South 6th Street, Suite #100
Las Vegas, NV 89101
(702) 400-0000
"Unbundled" Attorney for Defer


FRANK TOTI, ESQ.
Nevada Bar No.: 5804
6900 Westcliff Drive, #500
Las Vegas, Nevada 89145
(702) 364-1604
Attorneys for Plaintiff

IT IS HERBY ORDERED that based on the foregoing STIPULATION, that the Evidentiary Hearing currently scheduled for June 9, 2020 at 1:30 p.m., shall be rescheduled to be heard on the 27 day of AUGUST, 2020 at the hour of 9:00 m, A m., before the Eighth Judicial District Court, Family Division, located at 601 North Pecos, Las Vegas, Nevada before Department I. (Stack #2)

IT IS FURTHER ORDERED that Pre-Trial Memorandum shall be filed on or before the 7 day of AUGUST, 2020 a copy of same is to be hand-delivered to Judge's chambers and served on opposing counsel the same day. Failure to submit the Pre-Trial Memorandum on or before this date, absent the Court's approval, will result in the trial date being vacated and the matter rescheduled in ordinary course and/or sanctions.

Page - 2

Williams v. Williams Case D 19 586291 D
SAO to Continue Evidentiary Hearing

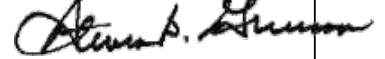
IT IS FURTHER ORDERED that all discovery shall be completed no later than the 3 day of AUGUST 2020. Any and all Exhibits must be bound, tabbed and individually page numbered or Bates stamped consistent with each other and delivered to chambers on or about the 21 day of AUGUST 2020. All documents and exhibits must have been previously disclosed according to Rule 16.2 or through formal discovery.

IT IS SO ORDERED this 2 day of June, 2020.

Hon. Cheryl B. Moss @

Respectfully submitted:

Kenneth M. Robbins, Esq.
Nevada Bar No. 13572
732 South 6th Street, Suite #100
Las Vegas, NV 89101
(702) 400-0000 Telephone
(702) 425-1156 Facsimile
FamilyFirst@HalfPriceLawyers.com
"Unbundled" Attorney for Defendant



DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

NADINE ALECIA WILLIAMS,

Plaintiff,

vs.

Case No. D-19-586291-D

Dept. No. I

HERMAN GEORGE WILLIAMS,

Defendant.

ORDER SETTING CIVIL NON-JURY TRIAL

NOTICE: This Order sets forth critical dates and times for important proceedings in this case. It is the responsibility of the attorneys for the litigants or litigants appearing in proper person to meet the deadlines and to appear for the following required proceedings:

NON-JURY TRIAL DATE:

THURSDAY, FEBRUARY 11, 2021 at 9:00am

(stack #2)

(Non-Jury Trial continued from August 27, 2020 at 9:00am due to COVID-19)

1 ***The failure to APPEAR for the Non-Jury Trial may***
2
3 ***result in a dismissal of the case, a default judgment against***
4 ***the non-appearing party, or other appropriate sanctions,***
5 ***consistent with EDCR 2.69.***
6

7 **IT IS HEREBY ORDERED** that the Non-Jury Trial Brief outlining the
8 issues to be addressed at the Non-Jury Trial shall be filed at least three (3)
9 judicial days prior to the Non-Jury Trial or unless specified by the Court. Unless
10 all issues have been fully resolved, the failure of one party to timely submit a
11 Non-Jury Trial Brief will result in the issuance of sanctions of \$150.00. A copy
12 of same is to be hand-delivered to the Judge's chambers and served on opposing
13 counsel the same day.
14
15

16 **IT IS FURTHER ORDERED** that all discovery shall be completed not
17 later than thirty (30) days prior to the Non-Jury Trial or unless is specified by the
18 Court.
19

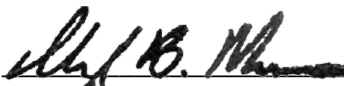
20 **IT IS FURTHER ORDERED** that this case will be tried in such an order
21 as the court directs. No continuances will be granted to either party unless
22 written application is made to the Court, served upon opposing counsel and a
23 hearing held at least three (3) days prior to the time of the Non-Jury Trial.
24

25 **IT IS FURTHER ORDERED** that both parties shall file updated
26 Financial Disclosure forms if there have been any changes to the ones previously
27 filed three (3) days prior to the Non-Jury Trial.
28

1 **IT IS FURTHER ORDERED** that the Judge's Chambers shall be given
2
3 immediate notice of any settlement or other action which will result in the Non-
4 Jury Trial not going forward.

5 **IT IS FURTHER ORDERED** that any and all Exhibits and Witness
6
7 Lists must be delivered to chambers at least one (1) judicial day prior to the
8 Non-Jury Trial for marking.

9 DATED this 11th day of August, 2020.

10
11 
12 **CHERYL B. MOSS**
13 **District Judge**

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on the above file stamped date, a copy of the attached
16 **Order Setting Civil Non-Jury Trial** to be E-SERVED AND EMAILED to the
17 following attorneys to:

18
19 **FRANK J. TOTI, ESQ.**
20 frank@fjtesq.com
21 Attorney for Plaintiff

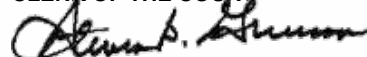
22 **KENNETH M. ROBBINS, ESQ.**
23 FamilyFirst@HalfPriceLawyers.com
24 Attorney for Defendant

25 /s/ Suzanna Zavala
26 **SUZANNA ZAVALA**
27 Judicial Executive Assistant to the
28 Honorable Cheryl B. Moss

FDF

Name: Frank J. Tosi, Esq.
Address: 6900 Westcliff Drive, Suite 500
Las Vegas, Nevada 89145
Phone: 702-364-1604; Fax: 702-364-1603
Email: Frank@fitesa.com
Attorney for Plaintiff
Nevada State Bar No. 005804

Electronically Filed
8/19/2020 4:47 PM
Steven D. Grierson
CLERK OF THE COURT



Eighth Judicial District Court

Clark County, Nevada

<u>Nadine Williams</u> Plaintiff, vs. <u>Herman William's jr</u> Defendant.	Case No. <u>D-19-580291-D</u> Dept. <u>1</u>
--	---

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (first, middle, last) Nadine alecia williams
2. How old are you? 38
3. What is your date of birth? 11.21.1982
4. What is your highest level of education? Masters degree in nursing

B. Employment Information:

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

☐ No

☒ Yes If yes, complete the table below. Attached an additional page if needed.

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
10/15/2015	Advance healthcare	Rn	Mon to friday	Varies

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: _____ Date of Hire: _____ Date of Termination: _____

Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 07.31.2020 my gross year to date pay is 85871.05.

B. Determine your Gross Monthly Income.

Hourly Wage

	×		=	\$0.00	×	52	=	\$0.00	÷	12	=	\$0.00
Hourly Wage		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Months		Gross Monthly Income

Annual Salary

\$115,000.00	÷	12	=	\$9,583.33
Annual Income		Months		Gross Monthly Income

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support			
Workman's Compensation			
Other:			
Total Average Other Income Received			\$0.00

Total Average Gross Monthly Income (add totals from B and C above)	\$9,583.33
--	------------

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	0.00
2.	Federal Health Savings Plan	
3.	Federal Income Tax	279.13
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): \$417.20	417.20
5.	Life, Disability, or Other Insurance Premiums	0.00
6.	Medicare	63.42
7.	Retirement, Pension, IRA, or 401(k)	0.00
8.	Savings	0.00
9.	Social Security	271.22
10.	Union Dues	0.00
11.	Other: (Type of Deduction)	
Total Monthly Deductions (Lines 1-11)		1,030.97

Business/Self-Employment Income & Expense Schedule**A. Business Income:**

What is your average gross (pre-tax) monthly income/revenue from self-employment or businesses?
\$ 0.00

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	Monthly	1,300.00	15,600.00
Taxes and licenses (include est. tax payments)			
Utilities			
Other:			
Total Average Business Expenses			15,600.00

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	0.00			
Auto Insurance	337.07			<input checked="" type="checkbox"/>
Car Loan/Lease Payment	0.00	<input checked="" type="checkbox"/>		
Cell Phone	320.00	<input checked="" type="checkbox"/>		
Child Support (not deducted from pay)	0.00			
Clothing, Shoes, Etc...	100.00	<input checked="" type="checkbox"/>		
Credit Card Payments (minimum due)	700.00	<input checked="" type="checkbox"/>		
Dry Cleaning	0.00	<input checked="" type="checkbox"/>		
Electric	394.00	<input checked="" type="checkbox"/>		
Food (groceries & restaurants)	1,000.00	<input checked="" type="checkbox"/>		
Fuel	480.00	<input checked="" type="checkbox"/>		
Gas (for home)	75.00	<input checked="" type="checkbox"/>		
Health Insurance (not deducted from pay)	0.00			
HOA	0.00			
Home Insurance (if not included in mortgage)	35.00	<input checked="" type="checkbox"/>		
Home Phone	0.00			
Internet/Cable	160.00	<input checked="" type="checkbox"/>		
Lawn Care	0.00	<input checked="" type="checkbox"/>		
Membership Fees	177.00	<input checked="" type="checkbox"/>		
Mortgage/Rent/Lease	2,692.00	<input checked="" type="checkbox"/>		
Pest Control	50.00	<input checked="" type="checkbox"/>		
Pets	100.00	<input checked="" type="checkbox"/>		
Pool Service	0.00			
Property Taxes (if not included in mortgage)	0.00			
Security	0.00			
Sewer	0.00			
Student Loans	0.00	<input checked="" type="checkbox"/>		
Unreimbursed Medical Expense	500.00	<input checked="" type="checkbox"/>		
Water	65.00	<input checked="" type="checkbox"/>		
Other: Debt consolidation loan	938.00			<input checked="" type="checkbox"/>
Total Monthly Expenses	8,123.07			

Household Information

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

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	Abigail Williams	10.27.04	Self	Yes	No
2 nd	Matthew Williams	05.13.10	Both	Yes	No
3 rd	Herman William's iii	08.24.08	Both	Yes	No
4 th	Elisha Williams	04.26.13	Both	Yes	No

- 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	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone	50.00			
Child Care				
Clothing	100.00	50.00	50.00	50.00
Education				
Entertainment	50.00	20.00	20.00	20.00
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation		20.00	20.00	20.00
Unreimbursed Medical Expenses	20.00	35.00	35.00	35.00
Vehicle				
Other:				
Total Monthly Expenses	220.00	125.00	125.00	125.00

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

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
Stephen Joyner	37	Domestic partner	\$ 1,000.00

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.	Chevy Silverado	\$ 25,000.00	-	\$ 0.00	=	\$ 25,000.00	Mine
2.		\$	-	\$	=	\$ 0.00	
3.		\$	-	\$	=	\$ 0.00	
4.		\$	-	\$	=	\$ 0.00	
5.		\$	-	\$	=	\$ 0.00	
6.		\$	-	\$	=	\$ 0.00	
7.		\$	-	\$	=	\$ 0.00	
8.		\$	-	\$	=	\$ 0.00	
9.		\$	-	\$	=	\$ 0.00	
10.		\$	-	\$	=	\$ 0.00	
11.		\$	-	\$	=	\$ 0.00	
12.		\$	-	\$	=	\$ 0.00	
13.		\$	-	\$	=	\$ 0.00	
14.		\$	-	\$	=	\$ 0.00	
15.		\$	-	\$	=	\$ 0.00	
Total Value of Assets (add lines 1-15)		\$ 25,000.00	-	\$ 0.00	=	\$ 25,000.00	

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.	Freedom financial	\$ 25,363.00	Mine
2.	Lending club	\$ 19,605.00	Mine
3.	Tax serv for Bridgeport, ct	\$ 8,500.00	Mine
4.	Credit cards	\$ 16,100.00	Mine
5.	Global finance	\$ 29,800.00	Mine
6.	Student loan	\$ 76,195.00	Mine
Total Unsecured Debt (add lines 1-6)		\$ 175,563.00	

CERTIFICATION

Attorney Information: Complete the following sentences:

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 \$ 3500 on my behalf.
3. I have a credit with my attorney in the amount of \$ _____.
4. I currently owe my attorney a total of \$ _____.
5. I owe my prior attorney a total of \$ _____.

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

Nw 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.

Nw 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/Nadine Williams
Signature

Date

CERTIFICATE OF SERVICE

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

That on (date) August 19, 2020, 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:

Kenneth Robbins, Esq., familyfirst@halfpricelawyers.com

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

Executed on the 19th day of August, 2020.

mor
Signature

07/08/2020

Nadine Williams

0.00

NON-NEGOTIABLE

****This is not a check. *****Advice of deposit only****

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 06/16/2020 - 06/30/2020

Nadine Williams 10116 Desert Trees St. Las Vegas NV, 89141	PAY		Hours	Rate	Current	YTD	TAXES		Current	YTD
	Salary		-	-	4,791.67	4,791.67	Federal Income Tax		279.13	5,346.95
	Mixed Visit		-	-	0.00	1,425.00	Social Security		271.21	4,393.57
	On Call - Weekend		-	-	0.00	1,275.00	Medicare		63.43	1,027.53
	RN Visit Rate		-	-	0.00	49,001.96				
	Case Conference		-	-	0.00	56.36				
	RN Start of Care		-	-	0.00	3,304.02				
	RN Discharge		-	-	0.00	6,429.90				
	Vacation Pay		-	-	0.00	9,809.36				
	Bonus		-	-	0.00	102.42				
	OTHER PAY				Current	YTD	DEDUCTIONS		Current	YTD
AHC Home Health of Las Vegas LL 10561 Jeffreys St Ste 105 Henderson NV, 89052										
							Blue Cross of Idaho		382.20	4,968.60
							Delta Dental of Idaho		26.00	364.00
							VSP		7.00	91.00

Pay Period
06/16/2020 - 06/30/2020

Pay Date
07/08/2020

MEMO:

BENEFITS Used Available

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$78,287.71
Taxes	\$613.77	\$10,768.05
Deductions	\$417.20	\$5,423.60
NET PAY:	\$3,760.70	\$3,760.70
Acct# 2298		

Nadine Williams 10116 Desert Trees St. Las Vegas NV, 89141	PAY		Hours	Rate	Current	YTD	TAXES		Current	YTD
	Salary		-	-	4,791.67	4,791.67	Federal Income Tax		279.13	5,346.95
	Mixed Visit		-	-	0.00	1,425.00	Social Security		271.21	4,393.57
	On Call - Weekend		-	-	0.00	1,275.00	Medicare		63.43	1,027.53
	RN Visit Rate		-	-	0.00	49,001.96				
	Case Conference		-	-	0.00	56.36				
	RN Start of Care		-	-	0.00	3,304.02				
	RN Discharge		-	-	0.00	6,429.90				
	Vacation Pay		-	-	0.00	9,809.36				
	Bonus		-	-	0.00	102.42				
	OTHER PAY				Current	YTD	DEDUCTIONS		Current	YTD
AHC Home Health of Las Vegas LL 10561 Jeffreys St Ste 105 Henderson NV, 89052										
							Blue Cross of Idaho		382.20	4,968.60
							Delta Dental of Idaho		26.00	364.00
							VSP		7.00	91.00

Pay Period
06/16/2020 - 06/30/2020

Pay Date
07/08/2020

MEMO:

BENEFITS Used Available

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$78,287.71
Taxes	\$613.77	\$10,768.05
Deductions	\$417.20	\$5,423.60
NET PAY:	\$3,760.70	\$3,760.70
Acct# 2298		

08/07/2020

Nadine Williams

0.00

NON-NEGOTIABLE

****This is not a check. *****Advice of deposit only****

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 07/16/2020 - 07/31/2020

Nadine Williams 10116 Desert Trees St. Las Vegas NV 89141	PAY				TAXES			
	Hours	Rate	Current	YTD		Current	YTD	
			4,791.87	14,378.01	Federal Income Tax	276.13	8,805.21	
			0.00	1,425.00	Social Security	271.22	4,936.01	
			0.00	1,278.00	Medicare	63.43	1,154.36	
			0.00	49,001.96				
			0.00	58.36				
			0.00	3,304.02				
			0.00	6,426.80				
			0.00	6,609.39				
			0.00	192.42				
AHC Home Health of Las Vegas LL 10361 Jordens St Ste 100 Henderson NV 89052					DEDUCTIONS	Current	YTD	
					Blue Cross of Idaho	342.20	5,733.00	
					Delta Dental of Idaho	28.00	420.00	
					VSP	7.00	105.00	
					OTHER PAY	Current	YTD	

Pay Period
07/16/2020 - 07/31/2020

Pay Date
08/07/2020

MEMO:

BENEFITS Used Available

SUMMARY				Current	YTD
Total Pay				\$4,791.87	\$65,871.00
Taxes				\$613.78	\$11,995.61
Deductions				\$417.20	\$6,258.00
NET PAY:				\$3,760.89	\$3,760.89

Nadine Williams 10116 Desert Trees St. Las Vegas NV 89141	PAY				TAXES			
	Hours	Rate	Current	YTD		Current	YTD	
			4,791.87	14,378.01	Federal Income Tax	276.13	8,805.21	
			0.00	1,425.00	Social Security	271.22	4,936.01	
			0.00	1,278.00	Medicare	63.43	1,154.36	
			0.00	49,001.96				
			0.00	58.36				
			0.00	3,304.02				
			0.00	6,426.80				
			0.00	6,609.39				
			0.00	192.42				
AHC Home Health of Las Vegas LL 10361 Jordens St Ste 100 Henderson NV 89052					DEDUCTIONS	Current	YTD	
					Blue Cross of Idaho	342.20	5,733.00	
					Delta Dental of Idaho	28.00	420.00	
					VSP	7.00	105.00	
					OTHER PAY	Current	YTD	

Pay Period
07/16/2020 - 07/31/2020

Pay Date
08/07/2020

MEMO:

BENEFITS Used Available

SUMMARY				Current	YTD
Total Pay				\$4,791.87	\$65,871.00
Taxes				\$613.78	\$11,995.61
Deductions				\$417.20	\$6,258.00
NET PAY:				\$3,760.89	\$3,760.89

1 TRANS

FILED

JAN 11 2022

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3 COPY

Sharon A. Hoffman
CLERK OF COURT

4
5 EIGHTH JUDICIAL DISTRICT COURT
6 FAMILY DIVISION
7 CLARK COUNTY, NEVADA
8

9 NADINE ALECIA WILLIAMS,)
10 Plaintiff,) CASE NO. D-16-586291-D
11 vs.) DEPT. I
12 HERMAN GEORGE WILLIAMS,)
13 Defendant.) APPEAL NO. 83263
(SEALED)

14
15 BEFORE THE HONORABLE SUNNY BAILEY
DISTRICT COURT JUDGE

16 TRANSCRIPT RE: CALENDAR CALL

17 THURSDAY, FEBRUARY 4, 2021

18 APPEARANCES:

19 The Plaintiff: NADINE ALECIA WILLIAMS (Tel.)
20 For the Plaintiff: FRANK J. TOTI, ESQ. (Tel.)
6900 Westcliff Drive, #500
21 Las Vegas, Nevada 89145
(702) 364-1604
22 The Defendant: HERMAN GEORGE WILLIAMS (Tel.)
23 For the Defendant: KENNETH M. ROBBINS, ESQ. (Tel.)
9205 W. Russel Rd., #240
24 Las Vegas, Nevada 89148
(702) 608-2331

1 LAS VEGAS, NEVADA

THURSDAY, FEBRUARY 4, 2021

2 P R O C E E D I N G S

3 (THE PROCEEDINGS BEGAN AT 8:43:12)

4

5 THE COURT: -- versus Williams, D-586291. Mr. Toti,
6 if you can please give your appearance for the record and that
7 of your client.

8 MR. TOTI: Judge, Frank Toti, bar number 5804,
9 appearing via video with my client Nadine Williams who is also
10 appearing via video.

11 THE COURT: All right. I note she's in a car. So
12 Ms. Williams, just make sure you're not driving at this time.
13 And Mr. Robbins, if you also can give your appearance for the
14 record and that of your client.

15 MR. ROBBINS: Good morning, Kenneth Robbins, bar
16 number 13572, for Herman Williams who is also present on
17 BlueJeans.

18 THE COURT: Thank you. This is the time for
19 calendar call. We have actual divorce and custody issues for
20 February 11th, 2021. Are all parties ready to proceed?

21 MR. ROBBINS: Yes, we are.

22 MR. TOTI: Yes, Judge.

23 THE COURT: All right. And we anticipate this
24 taking no longer than one half day, correct?

1 MR. ROBBINS: I would --
2 THE COURT: You get -- you get one half day. So --
3 MR. ROBBINS: It is --
4 THE COURT: -- I -- I should --
5 MR. ROBBINS: -- custody --
6 THE COURT: -- I should phrase that.
7 MR. ROBBINS: -- and divorce. Yeah, it is custody
8 and divorce and there's -- financially, she's as well as
9 alimony issues and the custody issue is maybe quite complex.
10 I guess I will try my best to have it done in one day -- half
11 a day rather, but I would not be surprised if we don't get
12 finished.
13 THE COURT: How many witnesses?
14 MR. ROBBINS: I think on our side we were probably
15 going to have about three.
16 THE COURT: Okay. Mr. Toti?
17 MR. TOTI: Two or three, Judge.
18 THE COURT: Okay. That's possible. And I'm
19 assuming that you guys are going to get together and stipulate
20 to quite a few exhibits. So that's going to save some time.
21 So at this point is one half day, each get 90 minutes.
22 MR. TOTI: Is the -- is that a morning setting or an
23 afternoon setting --
24 THE COURT: It's a --

1 MR. TOTI: -- Your Honor?

2 THE COURT: -- morning. It's 9:00 a.m.

3 MR. TOTI: Okay.

4 THE COURT: You have 9:00 a.m. until noon because we

5 have another court setting at 1:30, but if everyone is

6 organized and we don't waste any time and we get started right

7 at 9:00, I don't see any reason why we can't get done. I know

8 that Mr. Robbins and Mr. Toti are both very reasonable as far

9 as exhibits or whatnot. So make sure those are uploaded into

10 the system ahead of time. And then have all your witnesses

11 ready to go at -- at 9:00. They'll be waiting in the

12 unassigned room just like you guys were waiting earlier and

13 then we'll call them in one-by-one and we'll hold everything

14 in -- in the breakout session.

15 Obviously, if we don't have cumulative evidence and

16 there's remaining evidence to be heard, then we'll take it

17 from there. But I know both Counsels are experienced enough

18 to be succinct and to make sure that they're not doing

19 cumulative testimony.

20 Pretrial memorandums, I'm assuming those are coming?

21 MR. TOTI: Yes, Judge.

22 MR. ROBBINS: Yes, I believe the deadline was

23 tomorrow. We'll have ours in by tomorrow.

24 THE COURT: Perfect. Make sure you exchange all

1 exhibits. Make sure everything's done. And then I will see
2 everyone at 9:00 a.m. on --

3 MR. TOTI: And -- and Judge --

4 THE COURT: -- the 11th. Yes?

5 MR. TOTI: I apologize. I think -- I'm meeting with
6 my client tomorrow so I might not be able to get my pretrial
7 in until Monday. But it'll be Monday at the latest if that's
8 all right.

9 THE COURT: Monday very early at the latest.

10 MR. TOTI: It would be, Judge.

11 THE COURT: Thank you. All right.

12 MR. ROBBINS: And before we go -- before we go real
13 quick --

14 THE COURT: Yes.

15 MR. ROBBINS: -- while we have everyone here, there
16 was an issue just this past week or so with registration of a
17 truck. I just want to confirm that that now is taken care of
18 and -- and --

19 MR. TOTI: It is, Ken. Ken, I apologize. My client
20 sent me the registration a couple days ago. It went to my
21 junk folder. I found it. We emailed -- we forwarded it to
22 you at about 15, 20 minutes ago.

23 MR. ROBBINS: Okay. Thank you.

24 THE COURT: So it looks like everything else is

1 taken care of, no other issues?

2 MR. TOTI: Not at this time, Judge.

3 THE COURT: Okay. So I will see everyone on the
4 11th at 9:00 a.m. ready to go. Thank you so much. Oh --

5 MR. ROBBINS: Thank you.

6 THE COURT: -- also I forgot. You're -- as far as
7 Mr. Williams and Ms. Williams, you might want to be on
8 computers if we do show exhibits on the screen. It's going to
9 be very hard to see them on your cell phone. So just for that
10 purpose you might want to talk with your attorneys about
11 alternatives to make sure that you can see exhibits. We just
12 happen to have that come up on an -- something I hadn't
13 thought about how small those exhibits look on cell phones.
14 So just --

15 MR. ROBBINS: I'm going to --

16 THE COURT: -- make --

17 MR. ROBBINS: I'm going to have -- I'm going to have
18 my client come to my office.

19 THE COURT: Perfect. Thank you. And just make sure
20 that you have that access. Thank you so much. And you can
21 all hit the red box up at the top.

22 (PROCEEDINGS CONCLUDED AT 8:47:15)

23

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ATTEST: I do hereby certify that I have truly and
correctly transcribed the digital proceedings in the above-
entitled case to the best of my ability.

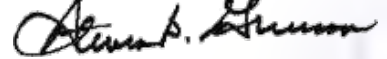
Adrian Medrano

Adrian N. Medrano

FDF

Name: Kenneth Robbins Esq.
Address: 732 S. 6th Street Suite 100
Las Vegas, NV 89101
Phone: 702-400-0000
Email: FamilyFirst@halfpricelawyers.com
Attorney for Plaintiff
Nevada State Bar No. 19572

Electronically Filed
2/4/2021 2:37 PM
Steven D. Grierson
CLERK OF THE COURT



Eighth Judicial District Court
Clark County, Nevada

<u>HERMAN GEORGE JR WILLIAMS</u> Plaintiff,	Case No. <u>D-19-586291-C</u>
vs.	Dept. <u>1</u>
<u>NADINE WILLIAMS</u> Defendant.	

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (first, middle, last) HERMAN GEORGE JR WILLIAMS
2. How old are you? _____
3. What is your date of birth? 08-05-1969
4. What is your highest level of education? HIGH SCHOOL

B. Employment Information:

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

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
NOV - 2018	COPART	CONTRACTOR	5	8 AM - 5 PM

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: _____ Date of Hire: _____ Date of Termination: _____
Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 2020 my gross year to date pay is \$68,000

B. Determine your Gross Monthly Income.

Hourly Wage

\$26.00	×	50.00	=	1307.69	×	52	=	68000	÷	12	=	5,666.66
Hourly Wage		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Months		Gross Monthly Income

Annual Salary

\$68,000.00	÷	12	=	5,666.66
Annual Income		Months		Gross Monthly Income

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support			
Workman's Compensation			
Other:			
Total Average Other Income Received			\$0.00

Total Average Gross Monthly Income (add totals from B and C above)	\$11,300.00
--	-------------

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): _____	0.00
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	
7.	Retirement, Pension, IRA, or 401(k)	
8.	Savings	
9.	Social Security	
10.	Union Dues	
11.	Other: (Type of Deduction) _____	
Total Monthly Deductions (Lines 1-11)		0.00

Business/Self-Employment Income & Expense Schedule

A. Business Income:

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

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

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

Personal Expense Schedule (Monthly)

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

Expense	Monthly Amount I Pay	For Me ☞	Other Party ☞	For Both ☞
Alimony/Spousal Support				
Auto Insurance	750.00	✓		
Car Loan/Lease Payment				
Cell Phone				
Child Support (not deducted from pay)				
Clothing, Shoes, Etc...				
Credit Card Payments (minimum due)				
Dry Cleaning				
Electric	108.00	✓		
Food (groceries & restaurants)	1,480.00	✓		
Fuel				
Gas (for home)	80.00	✓		
Health Insurance (not deducted from pay)				
HOA				
Home Insurance (if not included in mortgage)				
Home Phone	77.00	✓		
Internet/Cable	159.00	✓		
Lawn Care				
Membership Fees				
Mortgage/Rent/Lease	1,485.00	✓		
Pest Control				
Pets				
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer	150.00	✓		
Student Loans				
Unreimbursed Medical Expense				
Water	100.00	✓		
Other:				
Total Monthly Expenses	4,389.00			

Household Information

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

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	ABIGAIL WILLIAMS	10-27-04		YES	NO
2 nd	HERMAN III WILLIAMS	8-24-08	FATHER	YES	NO
3 rd	MATTHEW WILLIAMS	5-10-10	FATHER	YES	NO
4 th	ELISHA WILLIAMS	4-26-13	FATHER	YES	NO

- 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	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone		30.00	30.00	30.00
Child Care				
Clothing		100.00	100.00	100.00
Education				
Entertainment		150.00	150.00	150.00
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation		30.00	30.00	30.00
Unreimbursed Medical Expenses				
Vehicle				
Other:				
Total Monthly Expenses	0.00	310.00	310.00	310.00

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

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
PHYLLIS GAYLE		MOTHER - IN - LAW	\$ 700.00

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.		\$	- \$	= \$ 0.00	
2.		\$	- \$	= \$ 0.00	
3.		\$	- \$	= \$ 0.00	
4.		\$	- \$	= \$ 0.00	
5.		\$	- \$	= \$ 0.00	
6.		\$	- \$	= \$ 0.00	
7.		\$	- \$	= \$ 0.00	
8.		\$	- \$	= \$ 0.00	
9.		\$	- \$	= \$ 0.00	
10.		\$	- \$	= \$ 0.00	
11.		\$	- \$	= \$ 0.00	
12.		\$	- \$	= \$ 0.00	
13.		\$	- \$	= \$ 0.00	
14.		\$	- \$	= \$ 0.00	
15.		\$	- \$	= \$ 0.00	
Total Value of Assets (add lines 1-15)		\$ 0.00	- \$ 0.00	= \$ 0.00	

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.		\$	
2.		\$	
3.		\$	
4.		\$	
5.		\$	
6.		\$	
Total Unsecured Debt (add lines 1-6)		\$ 0.00	

CERTIFICATION

Attorney Information: Complete the following sentences:

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 \$ 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 \$ 0.00.

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

HW 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.

HW 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.


Signature

02 - 03 - 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:

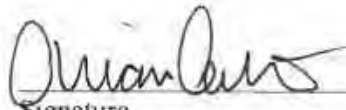
That on (date) February 4, 2021, service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

☐ 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:
Frank J. Toti, Esq.
frank@fjtesq.com
marie@fjtesq.com

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

Executed on the 4 day of February, 20 21


Signature

COPART

- LAS VEGAS
 . LAMB BLVD
 GAS, NV 89115
 638-9300

EXQUISITE TOWING ROADSIDE AS
 5321 CHINO HEIGHTS
 LAS VEGAS, NV 89081
 (702) 803-1066

Date 12/17/20
 Payment Reference # 009007
 Amount \$1,558.

Lot#	Description	Date	From/To	Zn HT	Amou
1110	06 MITS ECLIPSE GS SILVR	12/17/20	COPART NV - LAS VEGAS RESIDENCE	3	\$37.
1840	13 KIA SOUL + RED	12/14/20	HAMMER SUBLOT CALIBER COLLISION	3	\$37.
3740	01 HOND ACCORD EX SILVR	12/11/20	SERVICE KING COLLISION REPAIR COPART NV - LAS VEGAS	3	\$37.
5230	12 FORD FUSION SE GRAY	12/14/20	PU 12/14 ANY HAMMER SUBLOT	4	\$41.
2350	16 YAMA FZ09 C BLUE	12/14/20	OWNERS HOME COPART NV - LAS VEGAS	4	\$41.
8520	07 CHEV SILVERADO WHITE	12/11/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
3650	11 TOYT VENZA SILVR	12/15/20	ADESA HAMMER SUBLOT	2	\$34.
2970	05 HOND ODYSSEY EX WHITE	12/12/20	RESIDENCE COPART NV - LAS VEGAS	4	\$41.
1040	13 NISS ALTIMA 2.5 GOLD	12/11/20	AMERICAN CENTRAL COLLISION CEN COPART NV - LAS VEGAS	4	\$41.
3550	13 NISS ROGUE S BLACK	12/14/20	RESIDENCE COPART NV - LAS VEGAS	3	\$37.
4650	05 TOYT SIENNA CE GOLD	12/10/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
2390	11 TOYT CAMRY BASE BLACK	12/11/20	EWING BROS TRUCK REPAIR COPART NV - LAS VEGAS	2	\$34.
3480	14 TOYT PRIUS V SILVR	12/14/20	CORY MICHAEL WELLS OR MEGAN EL COPART NV - LAS VEGAS	7	\$51.
3970	18 HOND ACCORD EXL BLACK	12/11/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
3450	11 FORD FIESTA SE RED	12/11/20	BIG JOHNS TOWING COPART NV - LAS VEGAS	8	\$56.
6430	05 HOND CR-V LX BLUE	12/11/20	E & E VEHICLE SOLUTIONS COPART NV - LAS VEGAS	2	\$34.
1230	11 CHEV COLORADO GRAY	12/11/20	EWING BROS TOWING COPART NV - LAS VEGAS	2	\$34.
1390	05 TOYT CAMRY LE WHITE	12/17/20	CALIBER COPART NV - LAS VEGAS	4	\$41.
3950	19 BMW 18 GOLD	12/11/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
1300	07 FORD MUSTANG GT GREEN	12/12/20	RANDY CONNER COPART NV - LAS VEGAS	3	\$37.
7610	06 CADT STS GRAY	12/14/20	AFTER 12PM COPART NV - LAS VEGAS	4	\$41.
3460	04 CHEV SILVERADO WHITE	12/12/20	RESIDENCE COPART NV - LAS VEGAS	4	\$41.

COPART

- LAS VEGAS
 LAMB BLVD
 GAS, NV 89115
 638-9300

EXQUISITE TOWING ROADSIDE AS
 5321 CHINO HEIGHTS
 LAS VEGAS, NV 89081
 (702) 803-1066

Date 12/17/20
 Payment Reference # 009007
 Amount \$1,558.

Lot#	Description	Date	From/To	Zn HT	Amou
9620	06 NISS FRONTIER C WHITE	12/12/20	ALL CITY AUTO BODY COPART NV - LAS VEGAS	4	\$41.
9920	19 HYUN ACCENT SE SILVR	12/12/20	CEDRIC TOWNER COPART NV - LAS VEGAS	3	\$37.
2800	01 TOYT AVALON XL WHITE	12/15/20	EWING BROS TOWING COPART NV - LAS VEGAS	2	\$34.
4080	14 VOLK JETTA TD1 BLACK	12/14/20	RESIDENCE COPART NV - LAS VEGAS	2	\$34.
9590	12 HYUN SONATA GLS BLUE	12/15/20	PAUL BITAR COPART NV - LAS VEGAS	6	\$48.
4760	15 VOLK PASSAT S WHITE	12/16/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
0190	18 NISS SENTRA S BLACK	12/15/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
1910	18 INFI Q50 LUXE WHITE	12/16/20	HOUSE COPART NV - LAS VEGAS	3	\$37.
1000	15 HYUN GENESIS 3. UK	12/16/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
3420	14 NISS SENTRA S BLUE	12/15/20	E & E VEHICLE SOLUTIONS COPART NV - LAS VEGAS	2	\$34.
7740	20 HYUN ELANTRA SE SILVR	12/16/20	LATONYA HUNT COPART NV - LAS VEGAS	2	\$34.
5400	17 CHEV SPARK 1LT YELLO	12/16/20	RESIDENCE COPART NV - LAS VEGAS	2	\$34.
4890	09 BMW 650 I UK	12/16/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
7070	17 HYUN SONATA SE WHITE	12/15/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
0410	17 FORD FUSION SE BLUE	12/15/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
1670	92 LEXS SC 300 BLACK	12/16/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
7050	15 HYUN SONATA SE SILVR	12/15/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
6960	07 FORD MUSTANG GREEN	12/16/20	CLAIMANT'S HOME COPART NV - LAS VEGAS	2	\$34.
3000	20 NISS SENTRA S BLACK	12/16/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
5000	05 CHRY 300 TOURIN GREEN	12/17/20	RESIDENCE COPART NV - LAS VEGAS	2	\$34.
				Total	\$1,558

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 638-9300

EXQUISITE TOWING ROADSIDE AS
 5321 CHINO HEIGHTS
 LAS VEGAS, NV 89081
 (702) 803-1066

Date 12/30/20
 Payment Reference # 009098
 Amount \$685.

Lot#	Description	Date	From/To	2n HT	Amou
7100 02	TOYT TUNDRA ACC BLUE	12/23/20	GERALD BRASE COPART NV - LAS VEGAS	2	\$34.
3880 16	NISS VERSA NOTE BLACK	12/23/20	NORMAN GUNN COPART NV - LAS VEGAS	2	\$34.
8600 10	TOYT COROLLA SA BLACK	12/24/20	MONTEROZZA RESIDENCE COPART NV - LAS VEGAS	2	\$34.
9220 05	NISS ALTIMA S TAN	12/24/20	RESIDENCE BEFORE 12PM COPART NV - LAS VEGAS	2	\$34.
4810 13	BMW 528 I BROWN	12/24/20	RESIDENCE BEFORE 12PM HAMMER SUBLOT	4	\$41.
5250 03	INFI G35 SILVR	12/23/20	FAST TOWING INC COPART NV - LAS VEGAS	2	\$34.
5830 07	HOND ACCORD SE SILVR	12/24/20	RESIDENCE COPART NV - LAS VEGAS	2	\$34.
0900 14	NISS ALTIMA 2.5 UK	12/24/20	CALIBER COLLISION CENTERS SUMM HAMMER SUBLOT	4	\$41.
9480 18	JEP CHEROKEE L BLACK	12/23/20	JENNYS' HOUSE COPART NV - LAS VEGAS	2	\$34.
3320 06	DODG CHARGER SE BLACK	12/23/20	TIFFENY / LANGSTON BURKE/ COPART NV - LAS VEGAS	8	\$56.
4210 00	GMC YUKON BLACK	12/23/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
1270 12	NISS VERSA S GRAY	12/24/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
6820 00	ISU AMIGO BLUE	12/23/20	E & E VEHICLE SOLUTIONS COPART NV - LAS VEGAS	2	\$34.
9370 19	CHEV SILVERADO GRAY	12/24/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
2286 19	FORD FUSION TIT UNKNO	12/24/20	AVIS RENT A CAR HAMMER SUBLOT	3	\$37.
6040 12	VOLK ROUTAN SEL BLACK	12/24/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
1750 01	MERZ SLK 320 BLUE	12/24/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
3830 02	FORD F150 SUPER BROWN	12/24/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
4210 08	HOND ACCORD EXL BLACK	12/24/20	EWING BROS COPART NV - LAS VEGAS	2	\$34.
				Total	\$685.

COPART

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 538-9300

EXQUISITE TOWING ROADSIDE AS
 5321 CHINO HEIGHTS
 LAS VEGAS, NV 89081
 (702) 803-1066

Date 1/07/20
 Payment Reference # 009161
 Amount \$799.

Lot#	Description	Date	From/To	Zn HT	Amou
3301 18	TOYT CAMRY L WHITE	01/07/21	CLAIMANT'S COUSIN'S RESIDENCE COPART NV - LAS VEGAS	2	\$34.
8131 16	DODG DART SXT S WHITE	01/06/21	TAMMY COPART NV - LAS VEGAS	4	\$41.
1001 13	MERZ C 250 SILVR	01/05/21	FAST TOWING INC COPART NV - LAS VEGAS	2	\$34.
0541 05	DODG RAM 1500 S UK	01/06/21	EWING BROS COPART NV - LAS VEGAS	2	\$34.
6721 19	CHEV TRAVERSE I WHITE	01/05/21	EWING BROS COPART NV - LAS VEGAS	2	\$34.
3641 18	MERZ SPRINTER 2 BLACK	01/06/21	EWING BROS COPART NV - LAS VEGAS	2	\$34.
9271 19	TOYT COROLLA L GRAY	01/05/21	EWING BROTHERS INC COPART NV - LAS VEGAS	2	\$34.
6251 04	CADI ESCALADE I WHITE	01/05/21	EWING BROS TOWING COPART NV - LAS VEGAS	2	\$34.
8681 03	MITG GALANT ES GRAY	01/05/21	FAST TOWING COPART NV - LAS VEGAS	2	\$34.
5351 17	FORD MUSTANG UK	01/05/21	FAST TOWING INC COPART NV - LAS VEGAS	2	\$34.
2881 14	KIA OPTIMA LX GRAY	01/07/21	GUERO'S TEAM 702 AUTO REPAIR COPART NV - LAS VEGAS	2	\$34.
5751 10	DODG CHALLENGER UK	01/07/21	WESTERN ASSET RECOVERY COPART NV - LAS VEGAS	2	\$34.
7741 09	TOYT RAV4 WHITE	01/06/21	FAST TOWING COPART NV - LAS VEGAS	2	\$34.
0961 14	CHRY 300 BLACK	01/06/21	EWING BROS COPART NV - LAS VEGAS	2	\$34.
4471 11	HYUN SONATA SE BLACK	01/07/21	HERNANDEZ COPART NV - LAS VEGAS	3	\$37.
7531 13	TOYT SCION FR-S BLACK	01/06/21	W/ OWNER COPART NV - LAS VEGAS	2	\$34.
3411 12	LAND LR2 HSE UK	01/06/21	EWING BROS COPART NV - LAS VEGAS	2	\$34.
0641 06	NISS PATHFINDER BLUE	01/06/21	FAST TOWING COPART NV - LAS VEGAS	2	\$34.
7691 98	MERZ E 320 SILVR	01/06/21	FAST TOWING COPART NV - LAS VEGAS	2	\$34.
7320 03	TOYT COROLLA CE SILVR	01/06/21	HAMMER SUBLT RESIDENCE	2	\$34.
2760 20	ACUR MDX WHITE	01/06/21	COPART NV - LAS VEGAS GERBER COLLISON	4	\$41.
0090 06	FORD F350 SRW S BURG	01/05/21	EWING BROS COPART NV - LAS VEGAS	2	\$34.

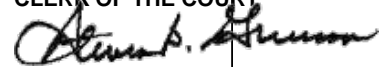
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- LAS VEGAS
. LAMB BLVD
GAS, NV 89115
638-9300

EXQUISITE TOWING ROADSIDE AS
5321 CHINO HEIGHTS
LAS VEGAS, NV 89081
(702) 803-1066

Date 1/07/20
Payment Reference # 009161
Amount \$799.

Lot#	Description	Date	From/To	Zn	HT	Amou
2570	12 NISS VERSA S GRAY	01/07/21	CALIBER COLLISION CENTERS NORT COPART NV - LAS VEGAS	2		\$34.
Total						\$799.



PMEM
KENNETH M. ROBBINS, ESQ
Nevada Bar No. 13572
732 South 6th Street, Suite #100
Las Vegas, NV 89101
(702) 400-0000 (Phone)
(702) 425-1156 (Fax)
FamilyFirst@HalfPriceLawyers.com
"Unbundled" Attorney for Defendant

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

NADINE WILLIAMS,)	
)	Case No.: D-19-586291-D
Plaintiff,)	
)	Dept.: I
vs.)	
)	Date of Evidentiary Hearing:
HERMAN WILLIAMS,)	02/11/2021
)	Hearing Time: 9:00 a.m.
Defendant.)	

DEFENDANT'S PRETRIAL MEMORANDUM

Defendant, Herman Williams by and through his Attorney, Kenneth Robbins Esq., hereby provides his Pre-trial Memorandum in this matter below.

I. STATEMENT OF ESSENTIAL FACTS

1. Parties:

- a. Plaintiff, Nadine Williams, 37 years old.
- b. Defendant, Herman Williams, 51 years old.

2. Minor children:

- a. Abigail Williams, born on October 7, 2004, 16 years old;

- 1 2. Unfortunately, there has been CPS involvement after the Plaintiff had been
2 physically abusive to the parties' daughter, Abigail. It was reported that Plaintiff
3 had hit Abigail in the head with a PVC pipe, resulting in a laceration. CPS
4 substantiated the report. Following this incident, Abigail was remaining with
5 Herman and stated in an interview conducted by Family Mediation Center that
6 she wished to remain with Herman. Strangely after having one visit with Plaintiff,
7 she changed her tune and has not wanted to return to Herman's care since.
8 Herman believes that the reason she now wishes to stay with Plaintiff is because
9 he caught her smoking marijuana and disciplined her for it. Plaintiff allows this
10 type of activity.
- 11 3. Due to Abigail's age, the Court granted teenage discretion for her visitation. When
12 that resulted in zero visits, the Court ordered that Abigail spend weekends with
13 Herman without discretion. Abigail came for her first visit, however that same
14 night she had Plaintiff pick her up and take her back to Plaintiff's house. Plaintiff
15 did in fact pick Abigail up, but not before Abigail was able to swipe the over \$1,000
16 in cash that Herman had on his dresser which was intended for his rent payment.
17 Abigail has not returned to Herman's care since.
- 18 4. The three boys have been visiting Plaintiff on weekends however many issues have
19 arisen. The current exchange time is Monday morning. Plaintiff has been
20 continuously late to exchanges and returns the boys without having fed them
21 breakfast. This has caused the boys to be late for school numerous times. The boys
22 have also complained about Plaintiff's boyfriend hitting them and other improper
23 care in Plaintiff's home.

24 //

1 **LEGAL ARGUMENT**

2 **I. CUSTODY**

3 NRS 125C.002 addresses the considerations of the Court with regards to legal
4 custody of a child. It provides, in pertinent part, that “When a court is making a
5 determination regarding the legal custody of a child, there is a presumption, affecting
6 the burden of proof, that joint legal custody would be in the best interest of a minor child
7 if: (a) The parents have agreed to an award of joint legal custody or so agree in open
8 court at a hearing for the purpose of determining the legal custody of the minor child;
9 or (b) a parent has demonstrated, or has attempted to demonstrate (except that the
10 efforts are frustrated by the other parent) an intent to establish a meaningful
11 relationship with the minor child. Herman is requesting sole legal custody of the three
12 boys. Herman believes that Plaintiff has mental issues which make her incapable of
13 making sound decisions. While Herman would be requesting sole custody of Abigail as
14 well, because the relationship has been so strained, Herman is conceding physical
15 custody of Abigail. As such, Plaintiff will necessarily need to have joint legal custody of
16 Abigail.

17 Under the new statutes promulgated by the Nevada Legislature, prior to making
18 an award of Primary Physical Custody, the Court must first do an analysis as to whether
19 it would be in a Child’s best interests to grant Joint Physical Custody. However,
20 pursuant to NRS 125C.003, there is a legal presumption that Joint Physical Custody is
21 not in a Child’s best interest if a parent has engaged in activities that are deemed
22 detrimental to the safety and welfare of a child. Those factors include:

- 23 **a. Inability to Adequately Care for Child for at Least 146 Days of the**
24 **Year.**

1 This does not apply.

2 **b. Abandonment.**

3 This is not an issue.

4 **c. Domestic Violence:**

5 Domestic violence has been an issue. Plaintiff has not only been violent with the
6 Herman, but also toward the children.

7
8 **NRS §125C.003(4) provides: In determining the best interest of the child, the court shall consider, among other things:**

9 **(a) The wishes of the child if the child is of sufficient age and capacity to form an intelligent preference as to their custody.**

10 Abigail inexplicably desires to live with Plaintiff, despite the abuse she has
11 suffered in her care. Unfortunately, the reason Abigail does wish to stay with Plaintiff
12 is because Plaintiff allows her to do whatever she wants, including drugs. The boys have
13 expressed desire to live with Herman.

14 **(b) Any nomination by a parent or a guardian for the child.**

15 This does not apply.

16 **(c) Which parent is more likely to allow the child to have frequent associations and a continuing relationship with the noncustodial parent.**

17
18 Plaintiff has taken numerous actions which would lend itself to a finding that
19 Plaintiff would not allow frequent associations if granted custody. Most importantly is
20 what has occurred with Abigail. Once Abigail went to stay with Plaintiff one time, she
21 has essentially not returned to Herman.

22 **(d) The level of conflict between the parents.**

1 The level of conflict is extremely high. Plaintiff has exacerbated the level of conflict
2 with her actions. During one exchange, Plaintiff came to Herman's apartment complex
3 and parked her car in front of the security gate, refusing to move. Not only could Herman
4 not leave, but none of Herman's neighbors were able to leave the complex either.

5 Another example of Plaintiff's games which have increased conflict is her actions
6 taken in regards to the parties' truck. Herman is a tow truck driver and needs his truck to
7 make money. Last year, Plaintiff cancelled the insurance on the truck so that Herman
8 would be unable to work. Plaintiff fixed the issue after being ordered by this Court,
9 however when the registration was set to be renewed again in January, 2021, Plaintiff
10 refused to give Herman the registration card so that he could pay the registration. This
11 resulted in attorneys needing to interject and caused Herman to miss more weeks of
12 work. Multiple more examples of high conflict will be presented.

13 **(e) The ability of the parents to cooperate to meet the needs of the**
14 **child.**

15 The Plaintiff has not cooperated to meet the needs of the children. Not only is she
16 allowing their daughter Abigail to do drugs, she has continuously cause the children to
17 be late for school because she won't cooperate with Herman on the drop off time.

18 **(f) The mental and physical health of the parents.**

19 Plaintiff clearly has some mental health issues that are ongoing, however they
20 may be undiagnosed.

21 **(g) The physical, developmental and emotional needs of the child.**

22 As stated, Plaintiff has been failing in her responsibility to meet the needs of the
23 children.
24

1 **(h) The nature of the relationship of the child with each parent.**

2 The boys are scared of Plaintiff and her boyfriend. They have a close relationship
3 with Herman.

4 **(i) The ability of the child to maintain a relationship with any**
5 **sibling.**

6 While Herman is requesting primary physical custody of the boys and requesting
7 that Plaintiff have primary custody of Abigail, the visitation schedule he proposes allows
8 the children to maintain a relationship. Herman proposes that Plaintiff have the boys
9 every other weekend and that Abigail be in his care during the weekends he has the boys.

10 **(j) Any history of parental abuse or neglect of the child or a sibling**
11 **of the child.**

12 Plaintiff's abuse towards the children is well documented and will be testified to
13 by multiple people.

14 **(k) Whether either parent or any other person seeking custody has**
15 **engaged in an act of domestic violence against the child, a parent of**
16 **the child or any other person residing with the child.**

17 As stated, Plaintiff has hit Abigail with a PVC pipe as well as hitting the children,
18 pulling their hair and kicking them.

19 **II. Assets and Debts**

20 The assets that the parties have are derived from their vehicles. As Herman uses
21 the 2015 Chevrolet as his primary transportation vehicle and as his means of
22 employment as a tow truck driver, Herman should keep this vehicle in his possession.
23 This vehicle is paid off in full. Plaintiff shall keep the other vehicles.

24 There are debts, mostly medical debts. Plaintiff cancelled the health insurance of
the children and Herman to be spiteful, which has now resulted in large medical debt.

1 As the debt was incurred due to her actions, she should be responsible for it. Plaintiff
2 also has student loan debt that she should incur as she is receiving the benefit of the
3 education.

4 **III. Child Support**

5 Child support is determined according to NAC 425. As Herman is requesting
6 primary custody of 3 of the children and Plaintiff to have primary custody of one, the
7 support numbers must be offset.

8 **IV. Alimony**

9 Alimony is determined according to NRS 125.150. This is a long term marriage
10 where during the course of the marriage, Plaintiff has always been the primary earner.
11 Plaintiff earns over \$10,000 per month, while Herman earns less than half of that. The
12 factors of NRS 125.150 support a significant alimony award.

13 **V. Attorney's Fees**

14 Herman has a basis to be awarded attorney's fees under *Sargeant v. Sargeant*.

15 **VI. List of Witnesses**

16 HERMAN GEORGE WILLIAMS
17 c/o Kenneth M. Robbins, Esq.
18 HALF PRICE LAWYERS
19 732 South 6th Street, Suite 100
20 Las Vegas, Nevada 89101
21 (702-400-0000)

22 Defendant, Herman George Williams is anticipated to testify regarding
23 the facts and circumstances of this case.

24 NADINE WILLIAMS
c/o Frank Toti, Esq.
6900 Westcliff Drive, #500
Las Vegas, Nevada 89145
(702-364-1604)

Plaintiff, Nadine Williams, is anticipated to testify regarding the facts and circumstances of this case.

KIMBERLY AVELLEZ
4018 Adabella Avenue, Bldg., #4, #204
Las Vegas, Nevada 89115
(347 360-1832)

Kimberly Avellez is Defendant's longtime friend and is anticipated to testify regarding the facts and circumstances of this case.

PHYLISS GAYLE
4018 Adabella Avenue, Bldg., #4, #204
Las Vegas, Nevada 89115
(702-354-5420)

Phyliss Gayle is Plaintiff's mother and is anticipated to testify regarding the facts and circumstances of this case.

1. All witnesses listed by any other party to this litigation in its Disclosure of witnesses and exhibits or called at the time of trial.

VII. Exhibits

VIII. INDEX OF EXHIBITS

IX.

X.

Ex #	Description	Bates ID	Offered	Admit	Denied
A	Dignity Health (St. Rose Dominican-San Martin) Statement.	HGW 001 HGW 002			
B	Emergency Physician Statement, dated March 28, 2019	HGW 003			
C	Digestive Associates, LLP, statement date March 6, 2019	HGW 004			
D	Online Information Services (for creditor Bessler MD PLLC).	HGW 005 HGW 006			
E	Midland Credit Management (For Credit One Bank).	HGW 007 HGW 008			
F	Dignity Health Statement	HGW 009 HGW 010			
G	Wakefield and Associates (for creditor Vituity Nevada).	HGW 011 HGW 012			
H	ARSTRAT (creditor for St. Rose).	HGW 013 HGW 014			
I	Dignity Health statements	HGW 015 HGW 022			

1	J	AMERICOLLECT (for creditor Radiology Assoc. of Nevada).	HGW 023 HGW 024			
2	K	Emergency Documentation for St. Rose Dominican Hospital Siena Campus.	HGW 025 HGW 041			
3	L	Plaintiff's passport	HGW 042 HGW 049			
4	M	Invoices and pictures of a Printing Laser Cut Machine that Plaintiff purchased. The Machine is in Jamaica	HGW 050 HGW 066			
5	N	Department of Family Services, dated November 14, 2019.	HGW 067			
6	O	Correspondence dated August 19, 2019 from Donna Gosnell, LMFT	HGW 068			
7	P	E mail dated November 12, 2019 from Gosnell Therapy to Defendant.	HGW 069			
8	Q	Certificate of Title for 2015 Silverado Chevrolet.	HGW 070			
9	R	List of the party's vehicles, and copies of the insurance on the vehicle. Also including a copy of Plaintiff adding her boyfriend to the insurance for the 2009 Kia Rondo.	HGW 071 HGW 079			
10	S	Plaintiff canceled Defendant's registration for the 2015 Chevrolet	HGW 080			
11	T	Receipt for the 2004 Silverado Chevrolet, reinstating the insurance that the Plaintiff cancelled.	HGW 081			
12	U	North Las Vegas Victims Information Guide, case 19102400000616.	HGW 082 HGW 083			
13	V	Las Vegas Metropolitan Police Department Contact Card.	HGW 084			
14	W	Eviction Notice to Plaintiff's mother, dated February 25, 2019	HGW 085 HGW 086			
15	X	Application for a Temporary and/or Extended Order for Protection Against Domestic Violence, filed February 22, 2019	HGW 087 HGW 095			
16	Y	Application for a Temporary and/or Extended Order for Protection Against Domestic Violence, filed February 25, 2019.	HGW 096 HGW 112			
17	Z	Application for a Temporary and/or Extended Order for Protection Against Domestic Violence, filed March 20, 2019	HGW 113 HGW 121			

AA	Application for a Temporary and/or Extended Order for Protection Against Domestic Violence, filed October 24, 2019.	HGW 122 HGW 130			
BB	Las Vegas Metropolitan Police Department, case LLV 190300131370, dated June 26, 2019	HGW 131 HGW 133			
CC	Las Vegas Metropolitan Police Department Property Report, dated November 24, 2018.	HGW 134			
DD	State of Nevada Department of Motor Vehicles, dated May 25, 2019	HGW 135			
EE	DMV for 2004 Chevrolet	HGW 136 HGW 137			
FF	Pictures of the Defendant's trucks that he uses for his work.	HGW 138 HGW 143			
GG	Request for Records Child Protective Services (CPS), dated November 12, 2019.	HGW 144 HGW 175			
FF	Multiple texts between Plaintiff and Defendant.	HGW 176 HGW 275			
GG	Correspondence from Ravello Townhomes to Defendant regard March 6, 2020 disturbance involving Plaintiff and a male friend	HGW 276			
HH	Copies of Money Orders that Defendant has been paying the IRS	HGW 277- HGW 278			
II	IRS Correspondence	HGW 279 HGW 302			
JJ	America First Credit Union statements for account Exquisite Roadside Assistance ending in 3748 statement date of February 29, 2020 and July 31, 2020 – December 31,	HGW 303 HGW 345			
KK	Taxserv Capital Services	HGW 346			
LL	Credit Collection Services for creditor Quest Diagnostics Inc.	HGW 347 HGW 350			
MM	Capital One correspondence dated June 20, 2020	HGW 351			
NN	Debt Recovery Solutions LLC dated July 1, 2020	HGW 352			
OO	Pendrick Capital Partners LLC dated June 26, 2020	HGW 353 HGW 354			
PP	Digestive Associates LLP statements for 2020	HGW 355 HGW 364			

1	QQ	Quest Diagnostics statement regarding Mathe, Abigail and Herman	HGW 365 HGW 367			
2	RR	Aargon Collection Agency dated October 15, 2020	HGW 368			
3	SS	AMR correspondence dated February 12, 2020	HGW 369			
4	TT	Midland Credit Management dated June 10, 2020	HGW 370			
5	UU	Credit One Bank Credit Card Statement, account ending in 0174, September 25, 2016 – October 24, 2016	HGW 371 HGW 372			
6	VV	Flowsheet Print Request for Elisha Williams, February 27, 2020 – March 3, 2020	HGW 373 HGW 378			
7	WW	Official check and receipt for 2015 Chevy Silverado, 2021 Registration paid by Defendant	HGW 379 HGW 380			
8	XX	Request for Admissions, dates December 6, 2019	HGW 381 HGW 383			
9	YY	Defendant's First Set of Interrogatories to Plaintiff, dated December 6, 2019	HGW 384 HGW 391			

Financial Disclosure Form Filing Dates:

a. Plaintiff: 08/19/2020 – Plaintiff's counsel has informed me that an updated FDF will be filed

b. Defendant: 02/04/2021

XI. Unusual Issues

None

XII. Length of Trial

This trial is scheduled for 1/2 day, however counsel believes it will take longer.

Respectfully submitted this 8 day of February, 2021.

/s/Kenneth M. Robbins
Kenneth Robbins, Esq.
Nevada Bar No.: 13572
Attorney for Defendant

CERTIFICATE OF SERVICE

1 I hereby certify that on the 8th day of February, 2021, the foregoing
2 DEFENDANT'S PRE TRIAL MEMORANDUM was served by electronic service via the
3 Eighth Judicial District Court E-Filing System to the following at their last known
4 addresses:

5 FRANK TOTI, Esq.
6 marie@fjtesq.com
7 frank@fjtesq.com
8 *Counsel for Plaintiff*

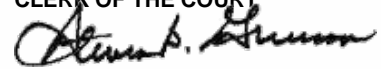
Dated this 8th day of February, 2021.

9 /s/Ariana Centeno
10 Legal Assistant
11
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13
14
15
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17
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19
20
21
22
23
24

FDF

Name: _____
Address: 6900 Westcliff Drive, Suite 500
Las Vegas, Nevada 89145
Phone: 702-364-1604; Fax: 702-364-1603
Email: _____
Attorney for _____
Nevada State Bar No. _____

Electronically Filed
2/9/2021 10:07 AM
Steven D. Grierson
CLERK OF THE COURT



Eighth Judicial District Court
Clark County, Nevada

<u>Nadine Williams</u> Plaintiff, vs. <u>Herman William's jr</u> Defendant.	Case No. _____ Dept. _____
--	-----------------------------------

GENERAL FINANCIAL DISCLOSURE FORM

A. Personal Information:

1. What is your full name? (*first, middle, last*) Nadine alecia williams
2. How old are you? 38
3. What is your date of birth? 11.21.1982
4. What is your highest level of education? Masters degree in nursing

B. Employment Information:

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

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
10/15/2015	Advance healthcare	Rn	Mon to friday	8 to 4

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: _____ Date of Hire: _____ Date of Termination: _____
Reason for Leaving: _____

Monthly Personal Income Schedule

A. Year-to-date Income.

As of the pay period ending 01 my gross year to date pay is 85871.05.

B. Determine your Gross Monthly Income.

Hourly Wage

	×		=	\$0.00	×	52	=	\$0.00	÷	12	=	\$0.00
Hourly Wage		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Months		Gross Monthly Income

Annual Salary

\$115,000.00	÷	12	=	\$9,583.33
Annual Income		Months		Gross Monthly Income

C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support			
Workman's Compensation			
Other:			
Total Average Other Income Received			\$0.00

Total Average Gross Monthly Income (add totals from B and C above)	\$9,583.33
--	------------

D. Monthly Deductions

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	0.00
2.	Federal Health Savings Plan	
3.	Federal Income Tax	279.13
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): \$417.20	417.20
5.	Life, Disability, or Other Insurance Premiums	0.00
6.	Medicare	63.42
7.	Retirement, Pension, IRA, or 401(k)	0.00
8.	Savings	0.00
9.	Social Security	271.22
10.	Union Dues	0.00
11.	Other: (Type of Deduction) 529 college savings program	100.00
Total Monthly Deductions (Lines 1-11)		1,130.97

Business/Self-Employment Income & Expense Schedule**A. Business Income:**

What is your average gross (pre-tax) monthly income revenue from self-employment or businesses?
\$ 0.00

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	Monthly	1,300.00	15,600.00
Taxes and licenses (include est. tax payments)			
Utilities			
Other:			
Total Average Business Expenses			15,600.00

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 ✍	Other Party ✍	For Both ✍
Alimony/Spousal Support	0.00			
Auto Insurance	425.92			✓
Car Loan/Lease Payment	150.00	✓		
Cell Phone	255.07			✓
Child Support (not deducted from pay)	0.00			
Clothing, Shoes, Etc...	100.00	✓		
Credit Card Payments (minimum due)	700.00	✓		
Dry Cleaning	0.00	✓		
Electric	350.00	✓		
Food (groceries & restaurants)	900.00	✓		
Fuel	450.00	✓		
Gas (for home)	65.00	✓		
Health Insurance (not deducted from pay)	49.54			
HOA	0.00			
Home Insurance (if not included in mortgage)	65.00	✓		
Home Phone	0.00			
Internet/Cable	158.01	✓		
Lawn Care	0.00	✓		
Membership Fees	0.00	✓		
Mortgage/Rent/Lease	2,692.00	✓		
Pest Control	50.00	✓		
Pets	55.00	✓		
Pool Service	0.00			
Property Taxes (if not included in mortgage)	0.00			
Security	0.00			
Sewer	0.00			
Student Loans	0.00			
Unreimbursed Medical Expense	500.00	✓		
Water	65.00	✓	✓	
Other: Debt consolidation loan	938.42			✓
Total Monthly Expenses	7,968.96			

Household Information

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

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 st	Abigail Williams	10.27.04	Self	Yes	No
2 nd	Matthew Williams	05.13.10	Both	Yes	No
3 rd	Herman William's iii	08.24.08	Both	Yes	No
4 th	Elisha Williams	04.26.13	Both	Yes	No

- 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	1 st Child	2 nd Child	3 rd Child	4 th Child
Cellular Phone	50.00			
Child Care				
Clothing	100.00	50.00	50.00	50.00
Education				
Entertainment	75.00	20.00	20.00	20.00
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs				
Transportation Costs for Visitation		20.00	20.00	20.00
Unreimbursed Medical Expenses	50.00			
Vehicle				
Other: Personal expense	30.00			
Total Monthly Expenses	305.00	90.00	90.00	90.00

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

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
Stephen Joyner	37	Domestic partner	\$ 600.00

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.	Chevy Silverado	\$ 25,000.00	-	\$ 0.00	=	\$ 25,000.00	Mine
2.		\$	-	\$	=	\$ 0.00	
3.		\$	-	\$	=	\$ 0.00	
4.		\$	-	\$	=	\$ 0.00	
5.		\$	-	\$	=	\$ 0.00	
6.		\$	-	\$	=	\$ 0.00	
7.		\$	-	\$	=	\$ 0.00	
8.		\$	-	\$	=	\$ 0.00	
9.		\$	-	\$	=	\$ 0.00	
10.		\$	-	\$	=	\$ 0.00	
11.		\$	-	\$	=	\$ 0.00	
12.		\$	-	\$	=	\$ 0.00	
13.		\$	-	\$	=	\$ 0.00	
14.		\$	-	\$	=	\$ 0.00	
15.		\$	-	\$	=	\$ 0.00	
Total Value of Assets (add lines 1-15)		\$ 25,000.00	-	\$ 0.00	=	\$ 25,000.00	

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.	Freedom financial	\$ 22,486.00	Mine
2.	Equiant financial services	\$ 7,641.00	Mine
3.	Tax serv for Bridgeport, ct	\$ 8,270.78	Mine
4.	Credit cards	\$ 16,634.00	Mine
5.	Global finance	\$ 29,800.00	Mine
6.	Student loan	\$ 76,195.00	Mine
Total Unsecured Debt (add lines 1-6)		\$ 161,026.78	

CERTIFICATION

Attorney Information: Complete the following sentences:

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 \$ 3500 on my behalf.
3. I have a credit with my attorney in the amount of \$ _____.
4. I currently owe my attorney a total of \$ _____.
5. I owe my prior attorney a total of \$ _____.

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

Nw 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.

Nw 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.

Signature

Date

CERTIFICATE OF SERVICE

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

That on *(date)* _____, 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:

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

Executed on the ____ day of _____, 20__.

Signature

02/08/2021

Nadine Williams

****3,763.79**

*****Three thousand seven hundred sixty-three and 79/100

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 01/16/2021 - 01/31/2021

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	14,375.01
On Call	-	-	0.00	100.00

TAXES	Current	YTD
Federal Income Tax	276.03	850.09
Social Security	271.22	819.85
Medicare	63.43	191.74

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

OTHER PAY	Current	YTD
-----------	---------	-----

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	1,146.60
Delta Dental of Idaho	28.00	84.00
VSP	7.00	21.00

Pay Period
01/16/2021 - 01/31/2021

Pay Date
02/08/2021

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$14,475.01
Taxes	\$810.68	\$1,861.68
Deductions	\$417.20	\$1,251.60
NET PAY:	\$3,763.79	

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	14,375.01
On Call	-	-	0.00	100.00

TAXES	Current	YTD
Federal Income Tax	276.03	850.09
Social Security	271.22	819.85
Medicare	63.43	191.74

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

OTHER PAY	Current	YTD
-----------	---------	-----

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	1,146.60
Delta Dental of Idaho	28.00	84.00
VSP	7.00	21.00

Pay Period
01/16/2021 - 01/31/2021

Pay Date
02/08/2021

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$14,475.01
Taxes	\$810.68	\$1,861.68
Deductions	\$417.20	\$1,251.60
NET PAY:	\$3,763.79	

01/22/2021

Nadine Williams

0.00

****This is not a check. *****Advice of deposit only****

NON-NEGOTIABLE

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 01/01/2021 - 01/15/2021

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	9,583.34
On Call	-	-	0.00	100.00

TAXES	Current	YTD
Federal Income Tax	276.03	574.08
Social Security	271.21	548.63
Medicare	63.43	126.31

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

OTHER PAY	Current	YTD
-----------	---------	-----

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	764.40
Delta Dental of Idaho	28.00	56.00
VSP	7.00	14.00

Pay Period
01/01/2021 - 01/15/2021

Pay Date
01/22/2021

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$9,683.34
Taxes	\$810.67	\$1,251.00
Deductions	\$417.20	\$834.40
NET PAY:		\$3,763.80
Acct#....2298:		\$3,763.80

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	9,583.34
On Call	-	-	0.00	100.00

TAXES	Current	YTD
Federal Income Tax	276.03	574.08
Social Security	271.21	548.63
Medicare	63.43	126.31

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

OTHER PAY	Current	YTD
-----------	---------	-----

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	764.40
Delta Dental of Idaho	28.00	56.00
VSP	7.00	14.00

Pay Period
01/01/2021 - 01/15/2021

Pay Date
01/22/2021

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$9,683.34
Taxes	\$810.67	\$1,251.00
Deductions	\$417.20	\$834.40
NET PAY:		\$3,763.80
Acct#....2298:		\$3,763.80

01/08/2021

Nadine Williams

****3,834.14**

*****Three thousand eight hundred thirty-four and 14/100

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 12/16/2020 - 12/31/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	4,791.67
On Call	-	-	100.00	100.00

TAXES	Current	YTD
Federal Income Tax	298.03	298.03
Social Security	277.42	277.42
Medicare	64.88	64.88

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

OTHER PAY	Current	YTD
-----------	---------	-----

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	382.20
Delta Dental of Idaho	28.00	28.00
VSP	7.00	7.00

Pay Period
12/16/2020 - 12/31/2020

Pay Date
01/08/2021

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,891.67	\$4,891.67
Taxes	\$640.33	\$640.33
Deductions	\$417.20	\$417.20
NET PAY:	\$3,834.14	

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	4,791.67
On Call	-	-	100.00	100.00

TAXES	Current	YTD
Federal Income Tax	298.03	298.03
Social Security	277.42	277.42
Medicare	64.88	64.88

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

OTHER PAY	Current	YTD
-----------	---------	-----

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	382.20
Delta Dental of Idaho	28.00	28.00
VSP	7.00	7.00

Pay Period
12/16/2020 - 12/31/2020

Pay Date
01/08/2021

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,891.67	\$4,891.67
Taxes	\$640.33	\$640.33
Deductions	\$417.20	\$417.20
NET PAY:	\$3,834.14	

12/23/2020

Nadine Williams

0.00

NON-NEGOTIABLE

****This is not a check. *****Advice of deposit only****

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 12/01/2020 - 12/15/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	57,500.04
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	8,417.38
Social Security	271.21	7,376.96
Medicare	63.43	1,725.26

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	9,172.80
Delta Dental of Idaho	28.00	672.00
VSP	7.00	168.00

AHC Home Health of Las Vegas LL
10581 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
12/01/2020 - 12/15/2020

Pay Date
12/23/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$128,996.08
Taxes	\$613.77	\$17,519.60
Deductions	\$417.20	\$10,012.80
NET PAY:		\$3,760.70
Acct# 2298:		\$3,760.70

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	57,500.04
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	8,417.38
Social Security	271.21	7,376.96
Medicare	63.43	1,725.26

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	9,172.80
Delta Dental of Idaho	28.00	672.00
VSP	7.00	168.00

AHC Home Health of Las Vegas LL
10581 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
12/01/2020 - 12/15/2020

Pay Date
12/23/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$128,996.08
Taxes	\$613.77	\$17,519.60
Deductions	\$417.20	\$10,012.80
NET PAY:		\$3,760.70
Acct# 2298:		\$3,760.70

12/08/2020

Nadine Williams

0.00

This is not a check. **Advice of deposit only***

NON-NEGOTIABLE

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 11/16/2020 - 11/30/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	52,708.37
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	8,138.25
Social Security	271.22	7,105.75
Medicare	63.43	1,661.83

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	8,790.60
Delta Dental of Idaho	28.00	644.00
VSP	7.00	161.00

Pay Period
11/16/2020 - 11/30/2020

Pay Date
12/08/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$124,204.41
Taxes	\$613.78	\$16,905.83
Deductions	\$417.20	\$9,595.60
NET PAY:		\$3,760.69
Acct#...2298:		\$3,760.69

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	52,708.37
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	8,138.25
Social Security	271.22	7,105.75
Medicare	63.43	1,661.83

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	8,790.60
Delta Dental of Idaho	28.00	644.00
VSP	7.00	161.00

Pay Period
11/16/2020 - 11/30/2020

Pay Date
12/08/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$124,204.41
Taxes	\$613.78	\$16,905.83
Deductions	\$417.20	\$9,595.60
NET PAY:		\$3,760.69
Acct#...2298:		\$3,760.69

11/23/2020

Nadine Williams

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NON-NEGOTIABLE

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 11/01/2020 - 11/15/2020

Nadine Williams
10116 Desert Trees St
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	47,916.70
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,859.12
Social Security	271.22	6,834.53
Medicare	63.43	1,598.40

AHC Home Health of Las Vegas LL
10581 Jeffreys St
Ste 105
Henderson
NV, 89052

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	8,408.40
Delta Dental of Idaho	28.00	616.00
VSP	7.00	154.00

Pay Period
11/01/2020 - 11/15/2020

Pay Date
11/23/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$119,412.74
Taxes	\$613.78	\$16,292.05
Deductions	\$417.20	\$9,178.40
NET PAY:		\$3,760.69
Acct# 2298:		\$3,760.69

Nadine Williams
10116 Desert Trees St
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	47,916.70
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,859.12
Social Security	271.22	6,834.53
Medicare	63.43	1,598.40

AHC Home Health of Las Vegas LL
10581 Jeffreys St
Ste 105
Henderson
NV, 89052

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	8,408.40
Delta Dental of Idaho	28.00	616.00
VSP	7.00	154.00

Pay Period
11/01/2020 - 11/15/2020

Pay Date
11/23/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$119,412.74
Taxes	\$613.78	\$16,292.05
Deductions	\$417.20	\$9,178.40
NET PAY:		\$3,760.69
Acct# 2298:		\$3,760.69

11/06/2020

Nadine Williams

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NON-NEGOTIABLE

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 10/16/2020 - 10/31/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	43,125.03
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.98
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,579.99
Social Security	271.22	6,563.31
Medicare	63.43	1,534.97

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	8,026.20
Delta Dental of Idaho	28.00	588.00
VSP	7.00	147.00

Pay Period
10/16/2020 - 10/31/2020

Pay Date
11/06/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$114,621.07
Taxes	\$813.78	\$15,678.27
Deductions	\$417.20	\$8,761.20
NET PAY:	\$3,760.69	
Acct#...2298:		\$3,760.69

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	43,125.03
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.98
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,579.99
Social Security	271.22	6,563.31
Medicare	63.43	1,534.97

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	8,026.20
Delta Dental of Idaho	28.00	588.00
VSP	7.00	147.00

Pay Period
10/16/2020 - 10/31/2020

Pay Date
11/06/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$114,621.07
Taxes	\$813.78	\$15,678.27
Deductions	\$417.20	\$8,761.20
NET PAY:	\$3,760.69	
Acct#...2298:		\$3,760.69

10/23/2020

Nadine Williams

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NON-NEGOTIABLE

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Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 10/01/2020 - 10/15/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	38,333.36
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,300.66
Social Security	271.21	6,292.09
Medicare	63.43	1,471.54

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	7,644.00
Delta Dental of Idaho	28.00	560.00
VSP	7.00	140.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
10/01/2020 - 10/15/2020

Pay Date
10/23/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$109,829.40
Taxes	\$613.77	\$15,084.49
Deductions	\$417.20	\$8,344.00
NET PAY:		\$3,760.70
Acct#.....2298:		\$3,760.70

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	38,333.36
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,300.66
Social Security	271.21	6,292.09
Medicare	63.43	1,471.54

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	7,644.00
Delta Dental of Idaho	28.00	560.00
VSP	7.00	140.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
10/01/2020 - 10/15/2020

Pay Date
10/23/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$109,829.40
Taxes	\$613.77	\$15,084.49
Deductions	\$417.20	\$8,344.00
NET PAY:		\$3,760.70
Acct#.....2298:		\$3,760.70

10/08/2020

Nadine Williams

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NON-NEGOTIABLE

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 09/16/2020 - 09/30/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	33,541.69
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,021.73
Social Security	271.22	6,020.88
Medicare	63.43	1,408.11

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	7,261.80
Delta Dental of Idaho	28.00	532.00
VSP	7.00	133.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
09/16/2020 - 09/30/2020

Pay Date
10/08/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$105,037.73
Taxes	\$613.78	\$14,450.72
Deductions	\$417.20	\$7,928.80
NET PAY:		\$3,760.69
Acct#...2298:		\$3,760.69

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	33,541.69
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	7,021.73
Social Security	271.22	6,020.88
Medicare	63.43	1,408.11

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	7,261.80
Delta Dental of Idaho	28.00	532.00
VSP	7.00	133.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
09/16/2020 - 09/30/2020

Pay Date
10/08/2020

MEMO:

BENEFITS	Used	Available
----------	------	-----------

SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$105,037.73
Taxes	\$613.78	\$14,450.72
Deductions	\$417.20	\$7,928.80
NET PAY:		\$3,760.69
Acct#...2298:		\$3,760.69

09/23/2020

Nadine Williams

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NON-NEGOTIABLE

****This is not a check. *****Advice of deposit only****

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 09/01/2020 - 09/15/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary			4,791.67	28,750.02
Missed Visit			0.00	1,425.00
On Call - Weekend			0.00	1,275.00
RN Visit Rate			0.00	49,001.96
Case Conference			0.00	58.36
RN Start of Care			0.00	3,304.02
RN Discharge			0.00	6,429.90
Vacation Pay			0.00	9,809.38
Bonus			0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	6,742.60
Social Security	271.22	5,749.66
Medicare	63.43	1,344.68

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	6,879.60
Delta Dental of Idaho	28.00	504.00
VSP	7.00	126.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
09/01/2020 - 09/15/2020

Pay Date
09/23/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$100,246.06
Taxes	\$613.78	\$13,836.94
Deductions	\$417.20	\$7,509.60
NET PAY:		\$3,760.69
Acct#...2298:		\$3,760.69

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary			4,791.67	28,750.02
Missed Visit			0.00	1,425.00
On Call - Weekend			0.00	1,275.00
RN Visit Rate			0.00	49,001.96
Case Conference			0.00	58.36
RN Start of Care			0.00	3,304.02
RN Discharge			0.00	6,429.90
Vacation Pay			0.00	9,809.38
Bonus			0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	6,742.60
Social Security	271.22	5,749.66
Medicare	63.43	1,344.68

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	6,879.60
Delta Dental of Idaho	28.00	504.00
VSP	7.00	126.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
09/01/2020 - 09/15/2020

Pay Date
09/23/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$100,246.06
Taxes	\$613.78	\$13,836.94
Deductions	\$417.20	\$7,509.60
NET PAY:		\$3,760.69
Acct# ...2298		\$3,760.69

09/08/2020

Nadine Williams

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****This is not a check. *****Advice of deposit only****

NON-NEGOTIABLE

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 08/16/2020 - 08/31/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	23,958.35
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	6,463.47
Social Security	271.21	5,478.44
Medicare	63.43	1,281.25

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	6,497.40
Delta Dental of Idaho	28.00	476.00
VSP	7.00	119.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

Pay Period
08/16/2020 - 08/31/2020

Pay Date
09/08/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$95,454.39
Taxes	\$613.77	\$13,223.16
Deductions	\$417.20	\$7,092.40
NET PAY:		\$3,760.70
Acct#.. 2298:		\$3,760.70

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	23,958.35
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	6,463.47
Social Security	271.21	5,478.44
Medicare	63.43	1,281.25

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	6,497.40
Delta Dental of Idaho	28.00	476.00
VSP	7.00	119.00

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV 89052

Pay Period
08/16/2020 - 08/31/2020

Pay Date
09/08/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$95,454.39
Taxes	\$613.77	\$13,223.16
Deductions	\$417.20	\$7,092.40
NET PAY:		\$3,760.70
Acct#.. 2298:		\$3,760.70

08/21/2020

Nadine Williams

0.00

NON-NEGOTIABLE

****This is not a check, *****Advice of deposit only****

Nadine Williams
10116 Desert Trees St.
Las Vegas NV 89141

Pay Period: 08/01/2020 - 08/15/2020

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

PAY	Hours	Rate	Current	YTD
Salary	-	-	4,791.67	19,166.68
Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
Case Conference	-	-	0.00	58.36
RN Start of Care	-	-	0.00	3,304.02
RN Discharge	-	-	0.00	6,429.90
Vacation Pay	-	-	0.00	9,809.38
Bonus	-	-	0.00	192.42
OTHER PAY			Current	YTD

TAXES	Current	YTD
Federal Income Tax	279.13	6,184.34
Social Security	271.22	5,207.23
Medicare	63.43	1,217.82

AHC Home Health of Las Vegas LL
10561 Jeffreys St
Ste 105
Henderson
NV, 89052

DEDUCTIONS	Current	YTD
Blue Cross of Idaho	382.20	6,116.20
Delta Dental of Idaho	28.00	448.00
VSP	7.00	112.00

Pay Period
08/01/2020 - 08/15/2020

Pay Date
08/21/2020

MEMO:

BENEFITS	Used	Available
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SUMMARY	Current	YTD
Total Pay	\$4,791.67	\$90,682.72
Taxes	\$613.78	\$12,609.39
Deductions	\$417.20	\$6,675.20
NET PAY:		\$3,760.69
Acct#.....2298:		\$3,760.69

Nadine Williams
10116 Desert Trees St.
Las Vegas
NV, 89141

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Missed Visit	-	-	0.00	1,425.00
On Call - Weekend	-	-	0.00	1,275.00
RN Visit Rate	-	-	0.00	49,001.96
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