

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

**\* \* \***

ADAM MICHAEL SOLINGER,

Appellant,

vs.

CHALESE MARIE SOLINGER,

Respondent.

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) Case No.: 84832-COA

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**APPELLANT'S APPENDIX  
VOLUME 3**

Vincent Mayo, Esq.  
Nevada State Bar Number: 8564  
The Abrams & Mayo Law Firm  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Tel.: (702) 222-4021  
Attorney for Appellant

## CERTIFICATE OF SERVICE

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

Alex Ghibaud, Esq.  
Michancy Cramer, Esq.  
Attorneys for Respondent

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

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
01/04/2019	Complaint For Divorce	1	1 - 6
01/04/2019	Request For Issuance Of Joint Preliminary Injunction	1	7
01/09/2019	Summons	1	8 - 9
01/09/2019	Proof Of Service	1	10
01/11/2019	Joint Preliminary Injunction	1	11 - 12
01/29/2019	Default	1	13
01/31/2019	Affidavit Of Resident Witness	1	14 - 15
02/01/2019	Certificate Of Completion COPE Class	1	16 - 18
02/01/2019	General Financial Disclosure Form	1	19 - 25
02/04/2019	Answer And Counterclaim	1	26 - 34
02/05/2019	Ex Parte Motion To Vacate Or Continue Hearing	1	35 - 39
02/07/2019	Amended Answer And Counterclaim	1	40 - 47
02/07/2019	Defendant's Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Order Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children, For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Plaintiff Alimony; And For Attorney Fees And Costs	1	48 - 61
02/07/2019	Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children, For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Defendant Child Support For An Order Awarding Defendant Alimony; And For Attorney Fees And Costs	1	62 - 75
02/07/2019	Order Setting Case Management Conference And Directing Compliance With NRCP 16.2	1	76 - 85
02/07/2019	Order For Family Mediation Center Services	1	86
02/14/2019	Notice Of Appearance Of Attorney	1	87 - 88
02/14/2019	Petition To Seal Records Pursuant To NRS 125.110(2)	1	89 - 90
02/21/2019	Notice Of 16.2 Early Case Conference	1	91 - 92
02/25/2019	Reply To Counterclaim For Divorce	1	93 - 96

**CHRONOLOGICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
02/26/2019	Plaintiff's Opposition To Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children; For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Defendant Alimony; And For Attorney's Fees And Costs Primary Physical Custody, Child Support, And Attorney's Fees And Costs And Countermotion For Joint Legal Custody; Primary Physical Custody To Plaintiff And Supervised Visitation To Defendant; To Establish Child Support; To Establish Payment Of Marital Expenses; For An Order Protecting The Parties Community Property; Defendant To Obtain Employment And To Cooperate In A Vocational Assessment	1	97 - 125
02/26/2019	Appendix Of Exhibits To Plaintiff's Opposition To Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children; For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Defendant Alimony; And For Attorney's Fees And Costs Primary Physical Custody, Child Support, And Attorney's Fees And Costs And Countermotion For Joint Legal Custody; Primary Physical Custody To Plaintiff And Supervised Visitation To Defendant; To Establish Child Support; To Establish Payment Of Marital Expenses; For An Order Protecting The Parties Community Property; Defendant To Obtain Employment And To Cooperate In A Vocational Assessment	1	126 - 173
02/26/2019	General Financial Disclosure Form	1	174 - 184
03/12/2019	Order To Seal Records Pursuant To NRS 125.110(2)	1	185 - 186
03/13/2019	Notice Of Entry Of Order To Seal Records	1	187 - 191
03/18/2019	Reply To Opposition And Countermotion	1	192 - 195



## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
03/18/2019	Appendix Of Supplemental Exhibits To Plaintiff's Opposition To Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children; For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Defendant Alimony; And For Attorney's Fees And Costs Primary Physical Custody, Child Support, And Attorney's Fees And Costs And Countermotion For Joint Legal Custody; Primary Physical Custody To Plaintiff And Supervised Visitation To Defendant; To Establish Child Support; To Establish Payment Of Marital Expenses; For An Order Protecting The Parties Community Property; Defendant To Obtain Employment And To Cooperate In A Vocational Assessment	1	196 - 215
03/19/2019	Case And Non-Jury Trial Management Order	1	216 - 219
03/19/2019	Behavior Order	1	220 - 224
03/20/2019	Notice Of Association Of Counsel	1	225 - 226
04/22/2019	Stipulation And Order Modifying Timeshare	1	227 - 229
04/23/2019	Notice Of Entry Of Stipulation And Order Modifying Timeshare	1	230 - 235
05/03/2019	Order After Hearing Of March 19, 2019	1	236 - 250
05/03/2019	Notice Of Entry Of Order After Hearing Of March 19, 2019	2	251 - 268
05/14/2019	Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief	2	269 - 299
05/14/2019	Appendix Of Exhibits In Support Of Plaintiff's Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief	2	300 - 391
05/15/2019	Plaintiff's Initial Expert Witness List	2	392 - 400
05/24/2019	Appendix Of Supplemental Exhibits In Support Of Plaintiff's Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief	2	401 - 404
05/28/2019	Opposition To Plaintiff's Emergency Motion For A Change Of Custody/Spousal Support/Child Support, For Attorney's Fees And Costs And Related Relief. Counter Motion For Change Of Custody For Primary Physical And Sole Legal Custody, Psychological Evaluation Of The Plaintiff	2	405 - 419
06/05/2019	Ex Parte Motion For An Order Shortening Time	2	420 - 429
06/11/2019	Reply In Support Of Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief And Opposition To Countermotion For Change Of Custody For Primary Physical And Sole Legal Custody, Psychological Evaluation Of The Plaintiff	2	430 - 453

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
06/11/2019	Appendix Of Exhibits In Support Of Plaintiff's Reply In Support Of Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief And Opposition To Countermotion For Change Of Custody For Primary Physical And Sole Legal Custody, Psychological Evaluation Of The Plaintiff	2	454 - 471
06/13/2019	Motion For An Order To Show Cause	2	472 - 484
06/29/2019	Opposition To Motion For An Order To Show Cause And Countermotion	2	485 - 500
07/15/2019	General Fiancial Disclosure Form	3	501 - 511
07/23/2019	Minute Order	3	512 - 514
07/25/2019	Motion For Division Of The Proceeds From The Sale Of The Marital Home, And For Attorney's Fees	3	515 - 520
07/26/2019	Notice Of Entry Of July 23, 2019 Minute Order	3	521 - 524
08/21/2019	Order After Hearing Of June 17, 2019	3	525 - 531
08/22/2019	Notice Of Entry Of Order After Hearing Of June 17, 2019	3	532 - 541
08/23/2019	Motion To Withdraw And Adjudicate Attorney's Lien	3	542 - 561
08/23/2019	Notice Of Attorney's Lien	3	562 - 564
08/28/2019	Minute Order - No Hearing Held	3	565 - 567
08/28/2019	Substitution Of Attorneys	3	568 - 570
08/28/2019	Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request)	3	571 - 583
08/28/2019	Exhibits To Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request)	3	584 - 598
08/28/2019	Notice Of Entry Of August 28, 2019 Minute Order	3	599 - 603
08/29/2019	Ex Parte Motion For Order Shortening Time To Hear Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request)	3	604 - 608
08/30/2019	Opposition To Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request); And Countermotion To Strike The Substitution Of Attorneys	3	609 - 624
09/04/2019	Order Shortening Time	3	625 - 626
09/06/2019	Case And Non-Jury Trial Management Order	3	627 - 630
09/09/2019	Defendant, Chalese Solinger's List Of Witnesses For Trial	3	631 - 636
09/09/2019	Notice Of Intent To File Opposition To Prior Counsel's Motion To Adjudicate Attorney's Lien	3	637 - 639
09/13/2019	Opposition To Louis C. Schneider's Motion To Adjudicate Attorney's Lien	3	640 - 650
09/16/2019	Order Setting Case Management Conference And Directing Compliance With NRCp 16.2	3	651 - 652
09/17/2019	Notice Of Seminar Completion	3	653 - 654

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
09/20/2019	Defendant's Notice Of UNLV Seminar Completion EDCR 5.07	3	655 - 656
09/20/2019	Affidavit Of Resident Witness	3	657 - 658
09/24/2019	General Financial Disclosure Form	3	659 - 669
09/30/2019	Re-Notice Of Hearing For Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	670 - 671
09/30/2019	Defendant's Notice Of Seminar Completion - EDCR 5.302	3	672 - 674
09/30/2019	Ex Parte Motion For Order Shortening Time To Hear Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	675 - 678
10/01/2019	Order Shortening Time	3	679 - 680
10/02/2019	Opposition To Defendant's Renoticed Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	681 - 692
10/02/2019	Defendant's Reply To Opposition To Defendant's Renoticed Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	693 - 702
10/03/2019	Order After Hearing Of August 1, 2019	3	703 - 707
10/04/2019	Notice Of Entry Of Order After Hearing Of August 1, 2019	3	708 - 715
10/09/2019	Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees	3	716 - 731
10/09/2019	Exhibits To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees	4	732 - 803
10/09/2019	Financial Disclosure Form	4	804 - 814
10/23/2019	Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Countermotion For Attorney's Fees And Costs	4	815 - 842
10/24/2019	Appendix Of Exhibits In Support Of Plaintiff's Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Countermotion For Attorney's Fees And Costs	4	843 - 850
10/24/2019	Plaintiff's Motion To Compel Discovery Responses And For Attorney's Fees	4	851 - 868
11/04/2019	Reply To Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Opposition To Countermotion For Attorney's Fees And Costs	4	869 - 888
11/04/2019	Exhibits To Reply To Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Opposition To Countermotion For Attorney's Fees And Costs	4	889 - 930
11/07/2019	Defendant's Opposition To Plaintiff's Motion To Compel Discovery Responses And For Attorney's Fees	4	931 - 939
11/08/2019	Errata To Opposition To Plaintiff's Motion To Compel Discovery Responses And For Attorney's Fees	4	940 - 943
11/12/2019	Response In Support Of Opposition	4	944 - 971

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
11/12/2019	Appendix Of Exhibits In Support Of Plaintiff's Response In Support Of Opposition	5	972 - 1038
11/14/2019	Ex Parte Motion For An Order To Release Electronics To Adam's Agent Or, In The Alternative, For An Order Barring The Release Of Electronics Until Further Court Order	5	1039 - 1053
11/15/2019	Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1054 - 1072
11/15/2019	Exhibits To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1073 - 1109
11/15/2019	Errata To Exhibits To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1110 - 1112
11/18/2019	Defendant's Response To Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	5	1113 - 1128
11/18/2019	Exhibits To Defendant's Response To Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	5	1129 - 1163
11/19/2019	Motion For Protective Order	5	1164 - 1176
11/20/2019	Application For Order Shortening Time	5	1177 - 1179
11/21/2019	Order Shortening Time	5	1180 - 1181
11/21/2019	Supplemental Appendix Of Exhibits In Support Of Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	5	1182 - 1192
11/21/2019	Notice Of Entry Of Order Shortening Time	5	1193 - 1197
11/21/2019	Ex Parte Application For An Order Shortening Time On Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1198 - 1200
11/22/2019	Defendant's Joinder To Joshua Lloyd's Motion For Protective Order And Countermotion For Fees From Plaintiff To Defendant	5	1201 - 1212
11/22/2019	Exhibits To Defendant's Joinder To Joshua Lloyd's Motion For Protective Order And Countermotion For Fees From Plaintiff To Defendant	5	1213 - 1222
11/22/2019	Order After Hearing Of September 6, 2019	6	1223 - 1225
11/22/2019	Notice Of Entry Of Order After Hearing Of September 6, 2019	6	1226 - 1231
11/26/2019	Objection To Discovery Commissioners Report And Recommendations Filed November 12, 2019	6	1232 - 1244
11/26/2019	Appendix Of Exhibits In Support Of Objection To Discovery Commissioners Report And Recommendations Filed November 12, 2019	6	1245 - 1280
11/26/2019	Opposition To Mr. Lloyd's Motion For Protective Order And Countermotion For Attorney's Fees And Costs	6	1281 - 1296
11/26/2019	Appendix Of Exhibits In Support Of Plaintiff's Opposition To Mr. Lloyd's Motion For Protective Order And Countermotion For Attorney's Fees And Costs	6	1297 - 1332

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
11/29/2019	Plaintiff's Reply In Support Of Motion To Compel Discovery Responses And For Attorney's Fees	6	1333 - 1345
12/02/2019	Reply To Plaintiff's Opposition To Mr. Lloyd's Motion For Protective Order And Countermotion For Attorney's Fees And Costs	6	1346 - 1373
12/04/2019	Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees And Related Relief And Countermotion For Attorney's Fees And Costs	6	1374 - 1405
12/06/2019	Reply To Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief And Opposition To Countermotion For Attorney's Fees And Costs	6	1406 - 1415
12/06/2019	Exhibits To Reply To Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief And Opposition To Countermotion For Attorney's Fees And Costs	7	1416 - 1495
12/06/2019	Second Supplemental Appendix Of Exhibits In Support Of Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	7	1496 - 1536
12/06/2019	Supplemental Declaration To Reply To Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief And Opposition To Countermotion For Attorney's Fees And Costs	7	1537 - 1539
12/09/2019	Referral Order For Outsourced Evaluation Services	7	1540
12/09/2019	Case And Non Jury Trial Management Order	7	1541 - 1544
12/12/2019	Order After Hearing Of October 3, 2019	7	1545 - 1548
12/12/2019	Notice Of Entry Of Order After Hearing Of October 3, 2019	7	1549 - 1555
12/12/2019	Plaintiff's Notice Of UNLV Seminar Completion EDCR 5.07	7	1556
12/27/2019	Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief	7	1557 - 1575
12/30/2019	Discovery Commissioners Report And Recommendations From 12/06/19 Hearing	7	1576 - 1580
12/31/2019	Plaintiff's Brunzell Affidavit For Attorney's Fees And Costs	7	1581 - 1629
01/02/2020	Defendant's Objection To Plaintiff's Brunzell Affidavit For Attorney's Fees And Costs	7	1630 - 1636
01/03/2020	Opposition To Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief; And Countermotion To Restore Joint Physical Custody And For Attorney's Fees	7	1637 - 1660
01/06/2020	Receipt Of Check	7	1661
01/06/2020	Receipt Of Check	7	1662
01/22/2020	Order On Discovery Commissioner's Report And Recommendations	7	1663 - 1664
01/22/2020	Notice Of Entry Of Order	8	1665 - 1668
01/23/2020	Notice Of Withdrawal Of Attorney Of Record	8	1669 - 1671

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
01/23/2020	Plaintiff's Reply In Support Of Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief; And Opposition To Defendant's Countermotion To Restore Joint Physical Custody And For Attorney's Fees	8	1672 - 1704
01/23/2020	Appendix Of Exhibits In Support Of Plaintiff's Reply In Support Of Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief; And Opposition To Defendant's Countermotion To Restore Joint Physical Custody And For Attorney's Fees	8	1705 - 1739
01/23/2020	Discovery Cmmissioner's Report And Recommendations From 12/06/19 Hearing	8	1740 - 1744
01/27/2020	Motion To Withdraw As Attorney Of Record For Defendant	8	1745 - 1753
02/04/2020	Ex Parte Motion For An Order Shortening Time	8	1754 - 1757
02/06/2020	No Contact Order	8	1758 - 1760
02/06/2020	Notice Of Entry Of No Contact Order	8	1761 - 1766
02/06/2020	Order From December 9, 2019 Hearing	8	1767 - 1774
02/06/2020	Notice Of Entry Of Order	8	1775 - 1784
02/12/2020	Request For Submission Of Motion To Withdraw As Counsel Of Record	8	1785 - 1786
02/12/2020	Notice Of Non-Opposition To Motion To Withdraw As Attorney Of Record For Defendant	8	1787 - 1788
02/13/2020	Minute Order	8	1789 - 1791
02/19/2020	Order On Discovery Commissioner's Report And Recommendations	8	1792 - 1799
02/20/2020	Notice Of Entry Of Order On Discovery Commissioner's Report And Recommendations	8	1800 - 1809
02/20/2020	Order To Withdraw As Counsel Of Record	8	1810 - 1811
02/20/2020	Substituttion Of Attorney	8	1812 - 1814
02/21/2020	Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief	8	1815 - 1832
02/24/2020	Supplemental Appendix Of Exhibits In Support Of Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief	8	1833 - 1849
02/25/2020	Defendant's Objection To Plaintiff's Supplemental Appendix	8	1850 - 1852
02/26/2020	Request For Child Protection Service Appearance And Records	8	1853
02/26/2020	Order Referring To Judicial Settlement Program	8	1854 - 1855
02/28/2020	Receipt Of Check	8	1856

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
03/16/2020	Opposition To Plaintiff's Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Counter Motion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	8	1857 - 1878
03/16/2020	Exhibit Appendix To Plaintiff's Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Counter Motion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	8	1879 - 1892
03/20/2020	Receipt Of Check	8	1893
03/25/2020	Notice Of Seminar Completion EDCR 5.302	8	1894 - 1896
03/30/2020	Reply In Support Of Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Partial Opposition To Countermotion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	9	1897 - 1918
03/30/2020	Supplemental Appendix Of Exhibits In Support Of Plaintiff's Reply In Support Of Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Partial Opposition To Countermotion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	9	1919 - 1959
03/31/2020	Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate; For Attorney's Fees And Costs And Related Relief	9	1960 - 1983
03/31/2020	Ex Parte Motion For An Order Shortening Time	9	1984 - 1987
03/31/2020	Stipulation And Order To Provide CPS Records And Drug Test Results To The Child Custody Evaluator	9	1988 - 1990
04/01/2020	Notice Of Entry Of Stipulation And Order To Provide CPS Records And Drug Test Results To The Child Custody Evaluator	9	1991 - 1996
04/01/2020	Order Shortening Time	9	1997 - 1998
04/02/2020	Notice Of Entry Of Order Shortening Time	9	1999 - 2003
04/02/2020	Substitution Of Attorneys	9	2004 - 2006
04/02/2020	Opposition To Plaintiff's Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate; For Attorney's Fees And Costs And Related Relief And Countermotion For An Order To Show Cause, Compensatory Visitation Time, And Attorney's Fees	9	2007 - 2028

**CHRONOLOGICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
04/03/2020	Reply In Support Of Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate; For Attorney's Fees And Costs And Related Relief And Opposition To Countermotion For An Order To Show Cause, Compensatory Visitation Time, And Attorney's Fees	9	2029 - 2045
04/09/2020	Appendix Of Supplemental Exhibits To Plaintiff's Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate And Related Relief	9	2046 - 2074
04/22/2020	Order From April 6, 2020 Hearing	9	2075 - 2078
04/22/2020	Notice Of Entry Of Order After Hearing Of April 6, 2020	9	2079 - 2085
04/26/2020	Plaintiff's Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive, For Attorney's Fees And Costs And Related Relief	9	2086 - 2099
04/27/2020	Appendix Of Exhibits In Support Of Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive; For Attorney's Fees And Costs Related Relief	9	2100 - 2129
04/28/2020	Opposition To Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive; For Attorney's Fees And Costs And Related Relief And Countermotion For Make-Up Visitation Time; To Admonish Plaintiff To Abide By Joint Legal Custody Standards; For Attorney's Fees; And Related Relief	10	2130 - 2162
04/28/2020	Exhibits To Opposition To Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive; For Attorney's Fees And Costs And Related Relief And Countermotion For Make-Up Visitation Time; To Admonish Plaintiff To Abide By Joint Legal Custody Standards; For Attorney's Fees; And Related Relief	10	2163 - 2203
05/13/2020	Order After Hearing February 26, 2020	10	2204 - 2211
05/14/2020	Notice Of Entry Of Order After Hearing Of February 26, 2020	10	2212 - 2222
05/19/2020	Reply In Support Of Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician S Directives; For Attorney S Fees And Costs And Related Relief And Opposition To Countermotion For Make-Up Visitation Time; To Admonish Plaintiff To Abide By Joint Legal Custody Standards; For Attorney S Fees; And Related Relief	10	2223 - 2242
05/22/2020	Defendant's Motion For An Order To Show Cause As To Why Plaintiff Should Not Be Held In Contempt, For Orders Regarding Health Insurance And Spousal Support, For Attorney's Fees, And Related Relief	10	2243 - 2272
05/22/2020	Exhibits To Defendant's Motion For An Order To Show Cause As To Why Plaintiff Should Not Be Held In Contempt, For Order Regarding Health Insurance And Spousal Support, For Attorney's Fees, And Related Relief	10	2273 - 2307



## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
05/22/2020	General Financial Disclosure Form	10	2308 - 2317
05/27/2020	Order To Show Cause	10	2318 - 2320
05/27/2020	Notice Of Entry Of Order	10	2321 - 2325
06/03/2020	Ex Parte Application For An Order To Show Cause	10	2326 - 2362
06/07/2020	Schedule Of Arrearages	10	2363 - 2366
06/19/2020	Plaintiff's Motion To Address Upcoming Trial Date And Findings In Regard To Chalese's Refusal To Timely Facilitate The Completion Of The Child Custody Evaluation	10	2367 - 2380
06/22/2020	Ex Parte Motion For An Order Shortening Time	11	2381 - 2384
06/22/2020	Order Shortening Time	11	2385 - 2386
06/22/2020	Notice Of Entry Of Order Shortening Time	11	2387 - 2391
06/26/2020	Opposition To Motion To Address Upcoming Trial Date And Findings In Regard To Chalese's Refusal To Timely Facilitate The Completion Of The Child Custody Evaluation And Countermotion For Plaintiff To File An Updated Fdf, For Attorney's Fees, And Related Relief	11	2392 - 2417
06/26/2020	Exhibits To Opposition To Motion To Address Upcoming Trial Date And Findings In Regard To Chalese's Refusal To Timely Facilitate The Completion Of The Child Custody Evaluation And Countermotion For Plaintiff To File An Updated Fdf, For Attorney's Fees, And Related Relief	11	2418 - 2434
06/29/2020	Stipulation And Order Regarding Orders To Show Cause	11	2435 - 2437
06/29/2020	Notice Of Entry Of Stipulation And Order Regarding The Orders To Show Cause	11	2438 - 2443
06/30/2020	General Financial Disclosure Form	11	2444 - 2454
07/06/2020	Order From June 1, 2020 Hearing	11	2455 - 2462
07/06/2020	Notice Of Entry Of Order	11	2463 - 2472
07/20/2020	Defendant's Motion To Extend Rebuttal Expert Deadline And For Attorney's Fees	11	2473 - 2484
07/21/2020	Ex Parte Application For An Order Shortening Time On Defendant's Motion To Extend Rebuttal Expert Deadline And For Attorney's Fees	11	2485 - 2487
07/21/2020	Stipulation And Order To Withdraw	11	2488 - 2490
07/21/2020	Notice Of Entry Of The Stipulation And Order To Withdraw	11	2491 - 2496
07/24/2020	Defendant's Motion To Extend Rebuttal Expert Deadline And For Attorney's Fees	11	2497 - 2508
07/29/2020	Defendant's Motion To Continue Trial (Second Request)	11	2509 - 2525
07/31/2020	Ex Parte Application For An Order Shortening Time On Defendant's Motion To Continue Trial (Second Request)	11	2526 - 2529
08/03/2020	Non-Opposition To Defendant's Motion To Continue Trial And Countermotion For Sanctions	11	2530 - 2543
08/05/2020	Reply To Plaintiff's Non-Opposition To Defendant's Motion To Continue Trial And Opposition To Plaintiff's Countermotion For Sanctions	11	2544 - 2552
08/10/2020	Order To Continue Trial	11	2553 - 2556

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
08/10/2020	Notice Of Entry Of Order To Continue Trial	11	2557 - 2562
08/19/2020	Order From The Hearing Held October 9, 2019	11	2563 - 2565
09/02/2020	Notice Of Appeal	11	2566 - 2568
09/02/2020	Case Appeal Statement	11	2569 - 2574
09/10/2020	Order From June 30, 2020 Hearing	11	2575 - 2578
09/10/2020	Notice Of Entry Of Order	11	2579 - 2584
09/21/2020	Notice Of Entry Of Order From October 9, 2019 Hearing	11	2585 - 2589
10/07/2020	Plaintiff's Motion To Clarify Courts June 30th Order After Hearing	11	2590 - 2595
10/07/2020	Defendant's Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	11	2596 - 2608
10/07/2020	Exhibits To Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	11	2609 - 2628
10/07/2020	Amended Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	12	2629 - 2642
10/12/2020	Ex Parte Application For An Order Shortening Time On Defendant's Amended Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	12	2643 - 2646
10/20/2020	Opposition To Plaintiff's Motion To Clarify Court's June 30th Order After Hearing	12	2647 - 2657
10/20/2020	Plaintiff's Opposition To Defendant's Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	12	2658 - 2676
10/21/2020	Order Shortening Time	12	2677 - 2679
10/21/2020	Notice Of Entry Of Order Shortening Time	12	2680 - 2684
10/29/2020	Minute Order	12	2685 - 2687
11/06/2020	Defendant's Brief Regarding Confidentiality Agreement	12	2688 - 2694
11/09/2020	Reply To Opposition To Plaintiff's Motion To Clarify Court's June 30th Order After Hearing	12	2695 - 2702
11/10/2020	Minute Order	12	2703 - 2704
11/13/2020	Plaintiff's Brief Regarding Confidentiality Agreement	12	2705 - 2710
11/13/2020	Stipulation And Order Regarding Confidentiality Agreement	12	2711 - 2717
11/16/2020	Notice Of Entry Of Stipulation And Order	12	2718 - 2726
12/14/2020	Plaintiff's Motion To Terminate Temporary Spousal Support	12	2727 - 2733
12/28/2020	Opposition To Motion To Terminate Temporary Spousal Support And Countermotion For Attorney's Fees	12	2734 - 2746
01/04/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Terminate Temporary Spousal Support.	12	2747 - 2753
01/04/2021	Reply To Opposition To Motion To Terminate Temporary Spousal Support And Opposition To Countermotion	12	2754 - 2765
01/05/2021	Plaintiff's Motion To Reassign	12	2766 - 2732

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
01/05/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Reassign	12	2733 - 2779
01/08/2021	Minute Order	12	2780 - 2781
01/12/2021	Notice Of Department Reassignment	12	2782 - 2784
03/09/2021	Order From February 18, 2021 Hearing	13	2785 - 2789
03/09/2021	Notice Of Entry Of Order	13	2790 - 2796
03/12/2021	Plaintiff's List Of Contested Art In His Possession And Art Believed To Be In Defendant's Possession	13	2797 - 2798
03/18/2021	Motion To Modify Temporary Physical Custody Pending Trial	13	2799 - 2808
03/19/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion Modify Temporary Physical Custody Pending Trial	13	2809 - 2815
03/23/2021	Order Shortening Time	13	2816 - 2818
03/28/2021	Defendant's Opposition To Plaintiff's Motion To Modify Temporary Physical Custody Pending Trial And Countermotion For Sanctions And Attorney's Fees	13	2819 - 2832
03/28/2021	Exhibits To Opposition To Plaintiff's Motion To Modify Temporary Physical Custody Pending Trial And Countermotion For Sanctions And Attorney's Fees	13	2833 - 2846
04/22/2021	Defendant's Emergency Motion To Allow Witness To Appear Virtually	13	2847 - 2859
04/22/2021	Exhibits To Emergency Motion To Allow Witness To Appear Virtually	13	2860 - 2871
04/22/2021	Motion In Limine To Recognize Dr. Paglini As Neutral Expert	13	2872 - 2877
04/27/2021	Opposition To Plaintiff's Motion In Limine	13	2878 - 2884
04/29/2021	Plaintiff's Opposition To Defendant's Emergency Motion To Allow Witness To Appear Virtually	13	2885 - 2891
05/03/2021	General Financial Disclosure Form	13	2892 - 2899
05/03/2021	Defendant's Pre-Trial Memorandum	13	2900 - 2919
05/03/2021	Plaintiff's Pre-Trial Memorandum	13	2920 - 2945
05/04/2021	Order From March 30, 2021 Hearing	13	2946 - 2949
05/04/2021	Notice Of Entry Of Order	13	2950 - 2955
05/07/2021	Defendant's EDCR 7.17 Trial Brief	13	2956 - 2999
05/07/2021	Notice Of Association Of Co-Counsel In An Unbundled Capacity	13	3000 - 3001
05/13/2021	Plaintiff's Motion To Disqualify	13	3002 - 3016
05/14/2021	Opposition To Motion To Disqualify And Countermotion For Attorney's Fees And Sanctions	14	3017 - 3047
05/24/2021	Response To Defendant's Motion To Disqualify Judge	14	3048 - 3051
05/27/2021	Minute Order	14	3052 - 3053
06/02/2021	Reply To Opposition To Motion To Disqualify And Opposition To Countermotion For Fees And Sanctions	14	3054 - 3069
06/03/2021	Emergency Motion Regarding Summer Custodial Timeshare	14	3070 - 3092
06/03/2021	Exhibits To Emergency Motion Regarding Summer Custodial Timeshare	14	3093 - 3112

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
06/03/2021	Ex Parte Application For An Order Shortening Time On Hearing For Plaintiff's Motion To Disqualify	14	3113 - 3118
06/04/2021	Order Shortening Time On Hearing For Plaintiff's Motion To Disqualify	14	3119 - 3121
06/04/2021	Notice Of Entry Of Order	14	3122 - 3126
06/09/2021	Minute Order	14	3127 - 3128
06/18/2021	Opposition To Defendant's Emergency Motion Regarding Custodial Timeshare	14	3129 - 3135
06/23/2021	Ex Parte Motion For Leave To File Reply To Opposition To Countermotion	14	3136 - 3140
06/23/2021	Amended Reply To Opposition To Motion To Disqualify And Opposition To Countermotion For Fees And Sanctions	14	3141 - 3157
06/24/2021	Decision And Order	14	3158 - 3165
06/24/2021	Ex Parte Application For An Order Shortening Time On Hearing On Emergency Motion Regarding Summer Custodial Timeshare	14	3166 - 3170
06/25/2021	Reply To Opposition To Emergency Motion Regarding Summer Custodial Timeshare	14	3171 - 3176
06/26/2021	Motion For Sanctions	14	3177 - 3186
06/27/2021	Opposition To Motion For Sanctions And Countermotion For Attorney's Fees And Sanctions	14	3187 - 3207
06/28/2021	Order Shortening Time	14	3208 - 3210
06/28/2021	Notice Of Entry Of Order	14	3211 - 3215
07/04/2021	Order (April 30, 2021 Hearing)	14	3216 - 3219
07/04/2021	Order From May 10, 2021	14	3220 - 3225
07/06/2021	Notice Of Entry Of Order	14	3226 - 3231
07/06/2021	Notice Of Entry Of Order	14	3232 - 3239
07/08/2021	Plaintiff's Financial Disclosure Form	14	3240 - 3250
07/22/2021	Minute Order	14	3251 - 3252
08/04/2021	Emergency Motion To Address Defendant's Intent To Withhold The Minor Children	14	3253 - 3261
08/04/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Emergency Motion To Address Defendant's Intent To Withhold The Minor Children	15	3262 - 3269
08/05/2021	Minute Order	15	3270 - 3271
08/06/2021	Opposition To Emergency Motion To Address Defendant's Intent To Withhold The Minor Children And Countermotion For Compensatory Time, Fees And Sanctions	15	3272 - 3284
08/06/2021	Errata To Defendant's Opposition To Emergency To Address Defendant's Intent To Withhold The Minor Children And Countermotion For Compensatory Time, Fees And Sanctions	15	3285 - 3287
08/08/2021	Order (July 8, 2021 Hearing)	15	3288 - 3292
08/23/2021	Reply In Support Of Emergency Motion To Address Defendant S Intent To Withhold The Minor Children	15	3293 - 3302
08/26/2021	Minute Order	15	3303 - 3305

## CHRONOLOGICAL INDEX

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
09/01/2021	General Financial Disclosure Form	15	3306 - 3317
09/16/2021	Association Of Counsel For Plaintiff	15	3318 - 3320
09/21/2021	Emergency Motion For Immediate Withdrawal Of Attorney	15	3321 - 3329
09/22/2021	Ex Parte Application For An Order Shortening Time On Defendant's Emergency Motion For Immediate Withdrawal Of Attorney	15	3330 - 3337
09/22/2021	Non-Opposition To Request For Order Shortening Time; Opposition To Facts Contained Within Request For Order Shortening Time	15	3338 - 3356
09/22/2021	Order Shortening Time	15	3357 - 3359
09/24/2021	Order To Withdraw As Counsel Of Record	15	3360 - 3363
09/27/2021	Notice Of Entry Of Order To Withdraw As Counsel Of Record	15	3364 - 3369
10/20/2021	Order (September 27, 2021)	15	3370 - 3373
12/21/2021	Motion To Expand Discovery To Include Up To Date Appclose Messges And Other Messages Sent By The Defendant	15	3374 - 3381
12/21/2021	Exhibits To Motion To Expand Discovery To Include Up To Date Appclose Messages And Other Messages Sent By The Defendant	15	3382 - 3394
12/27/2021	Notice Of Appearance	15	3395 - 3397
12/27/2021	Request And Order To Release Records	15	3398 - 3400
01/11/2022	Defendant's Opposition	15	3401 - 3406
01/19/2022	Reply In Support Of Motion To Expand Discovery To Include Up To Date Appclose Messages And Other Messages Sent By The Defendant	15	3407 - 3415
01/25/2022	Transcript from May 10, 2021 Evidentiary Hearing (Trial Day 1)	16	3416 - 3574
01/25/2022	Receipt of Copy of Transcript	16	3575
01/25/2022	Certification of Transcripts Notice of Completion	16	3576
01/25/2022	Final Billing of Transctips	16	3577
02/08/2022	Order From January 21, 2022 Trial	16	3578 - 3581
03/03/2022	Defendant's Financial Disclosure Form	16	3582 - 3592
03/04/2022	Plaintiff's Financial Disclosure Form	16	3593 - 3603
03/07/2022	Minute Order	16	3604 - 3605
03/16/2022	Defendant's Motion To Place On Calendar And Take Testimony	16	3606 - 3615
03/16/2022	Motion For Order Shortening Time	16	3616 - 3622
03/16/2022	Order Shortening Time	16	3623 - 3625
03/17/2022	Ex Parte Application For An Order Shortening Time On Defendant's Motion To Place On Calendar And Take Testimony	16	3626 - 3633
03/18/2022	Pecos Law Group's Memorandum Of Fees And Costs Per Court's Instruction On March 4, 2022	17	3634 - 3742
05/09/2022	Order From April 14, 2022 Motion Hearing	17	3743 - 3746
05/12/2022	Memorandum Of Fees And Costs	17	3747 - 3752
05/13/2022	Motion To Reconsider Decision After Defendant's Motion To Place On Calendar And Take Testimony	17	3753 - 3764
05/18/2022	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Reconsider Decision After Defendant's Motion To Place On Calendar And Take Testimony	17	3765 - 3771
05/18/2022	Defendant's Closing Brief	17	3772 - 3791

### **CHRONOLOGICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
05/19/2022	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Reconsider Decision After Defendant's Motion To Place On Calendar And Take Testimony	17	3792 - 3798
05/24/2022	Defendant's Opposition	17	3799 - 3813
05/25/2022	Decree Of Divorce	17	3814 - 3869
05/26/2022	Notice Of Entry	18	3870 - 3926
05/27/2022	Emergency Motion To Stay Judgement Pending Appeal	18	3927 - 3946
05/27/2022	Emergency Ex Parte Application For An Order Shortening Time On Plaintiffs Emergency Motion To Stay Judgement Pending Appeal	18	3947 - 3953
05/27/2022	Notice Of Appeal	18	3954 - 3955
05/27/2022	Opposition And Countermotion	18	3956 - 3972
05/31/2022	Order Re: Stay	18	3973 - 3977
05/31/2022	Notice Of Entry	18	3978 - 3983
06/06/2022	Case Appeal Statement	18	3984 - 3987
09/08/2022	Request For Rough Draft Transcript	18	3988 - 3990
09/13/2022	Estimate Of Rough Draft Transcripts	18	3991 - 3992
11/02/2022	Certification of Transcripts Notice of Completion	18	3993
11/02/2022	Transcript from January 21, 2022 Evidentiary Hearing (Trial Day 2)	19	3994 - 4155
11/02/2022	Transcript from March 1, 2022 Evidentiary Hearing (Trial Day 3)	20	4156 - 4402
11/02/2022	Transcript from March 2, 2022 Evidentiary Hearing (Trial Day 4)	21	4403 - 4669
11/02/2022	Transcript from March 3, 2022 Evidentiary Hearing (Trial Day 5)	22	4670 - 4770
11/02/2022	Transcript from April 14, 2022 Hearing (Trial Decision)	22	4771 - 4791

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
01/31/2019	Affidavit Of Resident Witness	1	14 - 15
09/20/2019	Affidavit Of Resident Witness	3	657 - 658
02/07/2019	Amended Answer And Counterclaim	1	40 - 47
10/07/2020	Amended Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	12	2629 - 2642
02/07/2019	Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children, For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Defendant Child Support For An Order Awarding Defendant Alimony; And For Attorney Fees And Costs	1	62 - 75
06/23/2021	Amended Reply To Opposition To Motion To Disqualify And Opposition To Countermotion For Fees And Sanctions	14	3141 - 3157
02/04/2019	Answer And Counterclaim	1	26 - 34
04/27/2020	Appendix Of Exhibits In Support Of Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive; For Attorney's Fees And Costs Related Relief	9	2100 - 2129
11/26/2019	Appendix Of Exhibits In Support Of Objection To Discovery Commissioners Report And Recommendations Filed November 12, 2019	6	1245 - 1280
05/14/2019	Appendix Of Exhibits In Support Of Plaintiff's Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief	2	300 - 391
10/24/2019	Appendix Of Exhibits In Support Of Plaintiff's Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Countermotion For Attorney's Fees And Costs	4	843 - 850
11/26/2019	Appendix Of Exhibits In Support Of Plaintiff's Opposition To Mr. Lloyd's Motion For Protective Order And Countermotion For Attorney's Fees And Costs	6	1297 - 1332
06/11/2019	Appendix Of Exhibits In Support Of Plaintiff's Reply In Support Of Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief And Opposition To Countermotion For Change Of Custody For Primary Physical And Sole Legal Custody, Psychological Evaluation Of The Plaintiff	2	454 - 471
01/23/2020	Appendix Of Exhibits In Support Of Plaintiff's Reply In Support Of Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief; And Opposition To Defendant's Countermotion To Restore Joint Physical Custody And For Attorney's Fees	8	1705 - 1739
11/12/2019	Appendix Of Exhibits In Support Of Plaintiff's Response In Support Of Opposition	5	972 - 1038

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
02/26/2019	Appendix Of Exhibits To Plaintiff's Opposition To Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children; For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Defendant Alimony; And For Attorney's Fees And Costs Primary Physical Custody, Child Support, And Attorney's Fees And Costs And Countermotion For Joint Legal Custody; Primary Physical Custody To Plaintiff And Supervised Visitation To Defendant; To Establish Child Support; To Establish Payment Of Marital Expenses; For An Order Protecting The Parties Community Property; Defendant To Obtain Employment And To Cooperate In A Vocational Assessment	1	126 - 173
05/24/2019	Appendix Of Supplemental Exhibits In Support Of Plaintiff's Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief	2	401 - 404
04/09/2020	Appendix Of Supplemental Exhibits To Plaintiff's Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate And Related Relief	9	2046 - 2074
03/18/2019	Appendix Of Supplemental Exhibits To Plaintiff's Opposition To Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children; For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Defendant Alimony; And For Attorney's Fees And Costs Primary Physical Custody, Child Support, And Attorney's Fees And Costs And Countermotion For Joint Legal Custody; Primary Physical Custody To Plaintiff And Supervised Visitation To Defendant; To Establish Child Support; To Establish Payment Of Marital Expenses; For An Order Protecting The Parties Community Property; Defendant To Obtain Employment And To Cooperate In A Vocational Assessment	1	196 - 215
11/20/2019	Application For Order Shortening Time	5	1177 - 1179
09/16/2021	Association Of Counsel For Plaintiff	15	3318 - 3320
03/19/2019	Behavior Order	1	220 - 224
12/09/2019	Case And Non Jury Trial Management Order	7	1541 - 1544
03/19/2019	Case And Non-Jury Trial Management Order	1	216 - 219
09/06/2019	Case And Non-Jury Trial Management Order	3	627 - 630
09/02/2020	Case Appeal Statement	11	2569 - 2574
06/06/2022	Case Appeal Statement	18	3984 - 3987
02/01/2019	Certificate Of Completion COPE Class	1	16 - 18
01/25/2022	Certification of Transcripts Notice of Completion	16	3576



**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
11/02/2022	Certification of Transcripts Notice of Completion	18	3993
01/04/2019	Complaint For Divorce	1	1 - 6
06/24/2021	Decision And Order	14	3158 - 3165
05/25/2022	Decree Of Divorce	17	3814 - 3869
01/29/2019	Default	1	13
09/09/2019	Defendant, Chalese Solinger's List Of Witnesses For Trial	3	631 - 636
11/06/2020	Defendant's Brief Regarding Confidentiality Agreement	12	2688 - 2694
05/18/2022	Defendant's Closing Brief	17	3772 - 3791
05/07/2021	Defendant's EDCR 7.17 Trial Brief	13	2956 - 2999
04/22/2021	Defendant's Emergency Motion To Allow Witness To Appear Virtually	13	2847 - 2859
03/03/2022	Defendant's Financial Disclosure Form	16	3582 - 3592
11/22/2019	Defendant's Joinder To Joshua Lloyd's Motion For Protective Order And Countermotion For Fees From Plaintiff To Defendant	5	1201 - 1212
11/15/2019	Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1054 - 1072
05/22/2020	Defendant's Motion For An Order To Show Cause As To Why Plaintiff Should Not Be Held In Contempt, For Orders Regarding Health Insurance And Spousal Support, For Attorney's Fees, And Related Relief	10	2243 - 2272
10/07/2020	Defendant's Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	11	2596 - 2608
10/09/2019	Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees	3	716 - 731
07/29/2020	Defendant's Motion To Continue Trial (Second Request)	11	2509 - 2525
08/28/2019	Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request)	3	571 - 583
07/20/2020	Defendant's Motion To Extend Rebuttal Expert Deadline And For Attorney's Fees	11	2473 - 2484
07/24/2020	Defendant's Motion To Extend Rebuttal Expert Deadline And For Attorney's Fees	11	2497 - 2508
03/16/2022	Defendant's Motion To Place On Calendar And Take Testimony	16	3606 - 3615
02/07/2019	Defendant's Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Order Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children, For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Plaintiff Alimony; And For Attorney Fees And Costs	1	48 - 61
09/30/2019	Defendant's Notice Of Seminar Completion - EDCR 5.302	3	672 - 674
09/20/2019	Defendant's Notice Of UNLV Seminar Completion EDCR 5.07	3	655 - 656

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
01/02/2020	Defendant's Objection To Plaintiff's Brunzell Affidavit For Attorney's Fees And Costs	7	1630 - 1636
02/25/2020	Defendant's Objection To Plaintiff's Supplemental Appendix	8	1850 - 1852
01/11/2022	Defendant's Opposition	15	3401 - 3406
05/24/2022	Defendant's Opposition	17	3799 - 3813
11/07/2019	Defendant's Opposition To Plaintiff's Motion To Compel Discovery Responses And For Attorney's Fees	4	931 - 939
03/28/2021	Defendant's Opposition To Plaintiff's Motion To Modify Temporary Physical Custody Pending Trial And Countermotion For Sanctions And Attorney's Fees	13	2819 - 2832
05/03/2021	Defendant's Pre-Trial Memorandum	13	2900 - 2919
10/02/2019	Defendant's Reply To Opposition To Defendant's Renoticed Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	693 - 702
11/18/2019	Defendant's Response To Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	5	1113 - 1128
01/23/2020	Discovery Cmmissioner's Report And Recommendations From 12/06/19 Hearing	8	1740 - 1744
12/30/2019	Discovery Commissioners Report And Recommendations From 12/06/19 Hearing	7	1576 - 1580
05/27/2022	Emergency Ex Parte Application For An Order Shortening Time On Plaintiffs Emergency Motion To Stay Judgement Pending Appeal	18	3947 - 3953
05/14/2019	Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief	2	269 - 299
09/21/2021	Emergency Motion For Immediate Withdrawal Of Attorney	15	3321 - 3329
06/03/2021	Emergency Motion Regarding Summer Custodial Timeshare	14	3070 - 3092
08/04/2021	Emergency Motion To Address Defendant's Intent To Withhold The Minor Children	14	3253 - 3261
05/27/2022	Emergency Motion To Stay Judgement Pending Appeal	18	3927 - 3946
08/06/2021	Errata To Defendant's Opposition To Emergency To Address Defendant's Intent To Withhold The Minor Children And Countermotion For Compensatory Time, Fees And Sanctions	15	3285 - 3287
11/15/2019	Errata To Exhibits To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1110 - 1112
11/08/2019	Errata To Opposition To Plaintiff's Motion To Compel Discovery Responses And For Attorney's Fees	4	940 - 943
09/13/2022	Estimate Of Rough Draft Transcripts	18	3991 - 3992
10/12/2020	Ex Parte Application For An Order Shortening Time On Defendant's Amended Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	12	2643 - 2646
09/22/2021	Ex Parte Application For An Order Shortening Time On Defendant's Emergency Motion For Immediate Withdrawal Of Attorney	15	3330 - 3337

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
11/21/2019	Ex Parte Application For An Order Shortening Time On Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1198 - 1200
07/31/2020	Ex Parte Application For An Order Shortening Time On Defendant's Motion To Continue Trial (Second Request)	11	2526 - 2529
07/21/2020	Ex Parte Application For An Order Shortening Time On Defendant's Motion To Extend Rebuttal Expert Deadline And For Attorney's Fees	11	2485 - 2487
03/17/2022	Ex Parte Application For An Order Shortening Time On Defendant's Motion To Place On Calendar And Take Testimony	16	3626 - 3633
06/03/2021	Ex Parte Application For An Order Shortening Time On Hearing For Plaintiff's Motion To Disqualify	14	3113 - 3118
06/24/2021	Ex Parte Application For An Order Shortening Time On Hearing On Emergency Motion Regarding Summer Custodial Timeshare	14	3166 - 3170
03/19/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion Modify Temporary Physical Custody Pending Trial	13	2809 - 2815
08/04/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Emergency Motion To Address Defendant's Intent To Withhold The Minor Children	15	3262 - 3269
01/05/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Reassign	12	2733 - 2779
05/18/2022	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Reconsider Decision After Defendant's Motion To Place On Calendar And Take Testimony	17	3765 - 3771
05/19/2022	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Reconsider Decision After Defendant's Motion To Place On Calendar And Take Testimony	17	3792 - 3798
01/04/2021	Ex Parte Application For An Order Shortening Time On Plaintiff's Motion To Terminate Temporary Spousal Support.	12	2747 - 2753
06/03/2020	Ex Parte Application For An Order To Show Cause	10	2326 - 2362
06/05/2019	Ex Parte Motion For An Order Shortening Time	2	420 - 429
02/04/2020	Ex Parte Motion For An Order Shortening Time	8	1754 - 1757
03/31/2020	Ex Parte Motion For An Order Shortening Time	9	1984 - 1987
06/22/2020	Ex Parte Motion For An Order Shortening Time	11	2381 - 2384
11/14/2019	Ex Parte Motion For An Order To Release Electronics To Adam's Agent Or, In The Alternative, For An Order Barring The Release Of Electronics Until Further Court Order	5	1039 - 1053
06/23/2021	Ex Parte Motion For Leave To File Reply To Opposition To Countermotion	14	3136 - 3140
09/30/2019	Ex Parte Motion For Order Shortening Time To Hear Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	675 - 678

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
08/29/2019	Ex Parte Motion For Order Shortening Time To Hear Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request)	3	604 - 608
02/05/2019	Ex Parte Motion To Vacate Or Continue Hearing	1	35 - 39
03/16/2020	Exhibit Appendix To Plaintiff's Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Counter Motion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	8	1879 - 1892
11/22/2019	Exhibits To Defendant's Joinder To Joshua Lloyd's Motion For Protective Order And Countermotion For Fees From Plaintiff To Defendant	5	1213 - 1222
11/15/2019	Exhibits To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief	5	1073 - 1109
05/22/2020	Exhibits To Defendant's Motion For An Order To Show Cause As To Why Plaintiff Should Not Be Held In Contempt, For Order Regarding Health Insurance And Spousal Support, For Attorney's Fees, And Related Relief	10	2273 - 2307
10/09/2019	Exhibits To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees	4	732 - 803
08/28/2019	Exhibits To Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request)	3	584 - 598
11/18/2019	Exhibits To Defendant's Response To Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	5	1129 - 1163
06/03/2021	Exhibits To Emergency Motion Regarding Summer Custodial Timeshare	14	3093 - 3112
04/22/2021	Exhibits To Emergency Motion To Allow Witness To Appear Virtually	13	2860 - 2871
10/07/2020	Exhibits To Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	11	2609 - 2628
12/21/2021	Exhibits To Motion To Expand Discovery To Include Up To Date Appclose Messages And Other Messages Sent By The Defendant	15	3382 - 3394
04/28/2020	Exhibits To Opposition To Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive; For Attorney's Fees And Costs And Related Relief And Countermotion For Make-Up Visitation Time; To Admonish Plaintiff To Abide By Joint Legal Custody Standards; For Attorney's Fees; And Related Relief	10	2163 - 2203

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
06/26/2020	Exhibits To Opposition To Motion To Address Upcoming Trial Date And Findings In Regard To Chalese's Refusal To Timely Facilitate The Completion Of The Child Custody Evaluation And Countermotion For Plaintiff To File An Updated Fdf, For Attorney's Fees, And Related Relief	11	2418 - 2434
03/28/2021	Exhibits To Opposition To Plaintiff's Motion To Modify Temporary Physical Custody Pending Trial And Countermotion For Sanctions And Attorney's Fees	13	2833 - 2846
12/06/2019	Exhibits To Reply To Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief And Opposition To Countermotion For Attorney's Fees And Costs	7	1416 - 1495
11/04/2019	Exhibits To Reply To Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Opposition To Countermotion For Attorney's Fees And Costs	4	889 - 930
01/25/2022	Final Billing of Transcripts	16	3577
10/09/2019	Financial Disclosure Form	4	804 - 814
07/15/2019	General Fiancial Disclosure Form	3	501 - 511
02/01/2019	General Financial Disclosure Form	1	19 - 25
02/26/2019	General Financial Disclosure Form	1	174 - 184
09/24/2019	General Financial Disclosure Form	3	659 - 669
05/22/2020	General Financial Disclosure Form	10	2308 - 2317
06/30/2020	General Financial Disclosure Form	11	2444 - 2454
05/03/2021	General Financial Disclosure Form	13	2892 - 2899
09/01/2021	General Financial Disclosure Form	15	3306 - 3317
01/11/2019	Joint Preliminary Injunction	1	11 - 12
05/12/2022	Memorandum Of Fees And Costs	17	3747 - 3752
07/23/2019	Minute Order	3	512 - 514
02/13/2020	Minute Order	8	1789 - 1791
10/29/2020	Minute Order	12	2685 - 2687
11/10/2020	Minute Order	12	2703 - 2704
01/08/2021	Minute Order	12	2780 - 2781
05/27/2021	Minute Order	14	3052 - 3053
06/09/2021	Minute Order	14	3127 - 3128
07/22/2021	Minute Order	14	3251 - 3252
08/05/2021	Minute Order	15	3270 - 3271
08/26/2021	Minute Order	15	3303 - 3305
03/07/2022	Minute Order	16	3604 - 3605
08/28/2019	Minute Order - No Hearing Held	3	565 - 567
03/31/2020	Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate; For Attorney's Fees And Costs And Related Relief	9	1960 - 1983
06/13/2019	Motion For An Order To Show Cause	2	472 - 484

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
02/21/2020	Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief	8	1815 - 1832
07/25/2019	Motion For Division Of The Proceeds From The Sale Of The Marital Home, And For Attorney's Fees	3	515 - 520
03/16/2022	Motion For Order Shortening Time	16	3616 - 3622
11/19/2019	Motion For Protective Order	5	1164 - 1176
12/27/2019	Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief	7	1557 - 1575
06/26/2021	Motion For Sanctions	14	3177 - 3186
04/22/2021	Motion In Limine To Recognize Dr. Paglini As Neutral Expert	13	2872 - 2877
12/21/2021	Motion To Expand Discovery To Include Up To Date Appclose Messges And Other Messages Sent By The Defendant	15	3374 - 3381
03/18/2021	Motion To Modify Temporary Physical Custody Pending Trial	13	2799 - 2808
05/13/2022	Motion To Reconsider Decision After Defendant's Motion To Place On Calendar And Take Testimony	17	3753 - 3764
08/23/2019	Motion To Withdraw And Adjudicate Attorney's Lien	3	542 - 561
01/27/2020	Motion To Withdraw As Attorney Of Record For Defendant	8	1745 - 1753
02/06/2020	No Contact Order	8	1758 - 1760
08/03/2020	Non-Opposition To Defendant's Motion To Continue Trial And Countermotion For Sanctions	11	2530 - 2543
09/22/2021	Non-Opposition To Request For Order Shortening Time; Opposition To Facts Contained Within Request For Order Shortening Time	15	3338 - 3356
02/21/2019	Notice Of 16.2 Early Case Conference	1	91 - 92
09/02/2020	Notice Of Appeal	11	2566 - 2568
05/27/2022	Notice Of Appeal	18	3954 - 3955
12/27/2021	Notice Of Appearance	15	3395 - 3397
02/14/2019	Notice Of Appearance Of Attorney	1	87 - 88
05/07/2021	Notice Of Association Of Co-Counsel In An Unbundled Capacity	13	3000 - 3001
03/20/2019	Notice Of Association Of Counsel	1	225 - 226
08/23/2019	Notice Of Attorney's Lien	3	562 - 564
01/12/2021	Notice Of Department Reassignment	12	2782 - 2784
05/26/2022	Notice Of Entry	18	3870 - 3926
05/31/2022	Notice Of Entry	18	3978 - 3983
08/28/2019	Notice Of Entry Of August 28, 2019 Minute Order	3	599 - 603
07/26/2019	Notice Of Entry Of July 23, 2019 Minute Order	3	521 - 524
02/06/2020	Notice Of Entry Of No Contact Order	8	1761 - 1766
01/22/2020	Notice Of Entry Of Order	8	1665 - 1668
02/06/2020	Notice Of Entry Of Order	8	1775 - 1784
05/27/2020	Notice Of Entry Of Order	10	2321 - 2325
07/06/2020	Notice Of Entry Of Order	11	2463 - 2472
09/10/2020	Notice Of Entry Of Order	11	2579 - 2584

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
03/09/2021	Notice Of Entry Of Order	13	2790 - 2796
05/04/2021	Notice Of Entry Of Order	13	2950 - 2955
06/04/2021	Notice Of Entry Of Order	14	3122 - 3126
06/28/2021	Notice Of Entry Of Order	14	3211 - 3215
07/06/2021	Notice Of Entry Of Order	14	3226 - 3231
07/06/2021	Notice Of Entry Of Order	14	3232 - 3239
04/22/2020	Notice Of Entry Of Order After Hearing Of April 6, 2020	9	2079 - 2085
10/04/2019	Notice Of Entry Of Order After Hearing Of August 1, 2019	3	708 - 715
05/14/2020	Notice Of Entry Of Order After Hearing Of February 26, 2020	10	2212 - 2222
08/22/2019	Notice Of Entry Of Order After Hearing Of June 17, 2019	3	532 - 541
05/03/2019	Notice Of Entry Of Order After Hearing Of March 19, 2019	2	251 - 268
12/12/2019	Notice Of Entry Of Order After Hearing Of October 3, 2019	7	1549 - 1555
11/22/2019	Notice Of Entry Of Order After Hearing Of September 6, 2019	6	1226 - 1231
09/21/2020	Notice Of Entry Of Order From October 9, 2019 Hearing	11	2585 - 2589
02/20/2020	Notice Of Entry Of Order On Discovery Commissioner's Report And Recommendations	8	1800 - 1809
11/21/2019	Notice Of Entry Of Order Shortening Time	5	1193 - 1197
04/02/2020	Notice Of Entry Of Order Shortening Time	9	1999 - 2003
06/22/2020	Notice Of Entry Of Order Shortening Time	11	2387 - 2391
10/21/2020	Notice Of Entry Of Order Shortening Time	12	2680 - 2684
08/10/2020	Notice Of Entry Of Order To Continue Trial	11	2557 - 2562
03/13/2019	Notice Of Entry Of Order To Seal Records	1	187 - 191
09/27/2021	Notice Of Entry Of Order To Withdraw As Counsel Of Record	15	3364 - 3369
11/16/2020	Notice Of Entry Of Stipulation And Order	12	2718 - 2726
04/23/2019	Notice Of Entry Of Stipulation And Order Modifying Timeshare	1	230 - 235
06/29/2020	Notice Of Entry Of Stipulation And Order Regarding The Orders To Show Cause	11	2438 - 2443
04/01/2020	Notice Of Entry Of Stipulation And Order To Provide CPS Records And Drug Test Results To The Child Custody Evaluator	9	1991 - 1996
07/21/2020	Notice Of Entry Of The Stipulation And Order To Withdraw	11	2491 - 2496
09/09/2019	Notice Of Intent To File Opposition To Prior Counsel's Motion To Adjudicate Attorney's Lien	3	637 - 639
02/12/2020	Notice Of Non-Opposition To Motion To Withdraw As Attorney Of Record For Defendant	8	1787 - 1788
09/17/2019	Notice Of Seminar Completion	3	653 - 654
03/25/2020	Notice Of Seminar Completion EDCR 5.302	8	1894 - 1896
01/23/2020	Notice Of Withdrawal Of Attorney Of Record	8	1669 - 1671
11/26/2019	Objection To Discovery Commissioners Report And Recommendations Filed November 12, 2019	6	1232 - 1244
05/27/2022	Opposition And Countermotion	18	3956 - 3972
06/18/2021	Opposition To Defendant's Emergency Motion Regarding Custodial Timeshare	14	3129 - 3135

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
12/04/2019	Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees And Related Relief And Countermotion For Attorney's Fees And Costs	6	1374 - 1405
10/23/2019	Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Countermotion For Attorney's Fees And Costs	4	815 - 842
08/30/2019	Opposition To Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines (First Request); And Countermotion To Strike The Substitution Of Attorneys	3	609 - 624
10/02/2019	Opposition To Defendant's Renoticed Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	681 - 692
08/06/2021	Opposition To Emergency Motion To Address Defendant's Intent To Withhold The Minor Children And Countermotion For Compensatory Time, Fees And Sanctions	15	3272 - 3284
09/13/2019	Opposition To Louis C. Schneider's Motion To Adjudicate Attorney's Lien	3	640 - 650
04/28/2020	Opposition To Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive; For Attorney's Fees And Costs And Related Relief And Countermotion For Make-Up Visitation Time; To Admonish Plaintiff To Abide By Joint Legal Custody Standards; For Attorney's Fees; And Related Relief	10	2130 - 2162
06/29/2019	Opposition To Motion For An Order To Show Cause And Countermotion	2	485 - 500
06/27/2021	Opposition To Motion For Sanctions And Countermotion For Attorney's Fees And Sanctions	14	3187 - 3207
06/26/2020	Opposition To Motion To Address Upcoming Trial Date And Findings In Regard To Chalese's Refusal To Timely Facilitate The Completion Of The Child Custody Evaluation And Countermotion For Plaintiff To File An Updated Fdf, For Attorney's Fees, And Related Relief	11	2392 - 2417
05/14/2021	Opposition To Motion To Disqualify And Countermotion For Attorney's Fees And Sanctions	14	3017 - 3047
12/28/2020	Opposition To Motion To Terminate Temporary Spousal Support And Countermotion For Attorney's Fees	12	2734 - 2746
11/26/2019	Opposition To Mr. Lloyd's Motion For Protective Order And Countermotion For Attorney's Fees And Costs	6	1281 - 1296
05/28/2019	Opposition To Plaintiff's Emergency Motion For A Change Of Custody/Spousal Support/Child Support, For Attorney's Fees And Costs And Related Relief. Counter Motion For Change Of Custody For Primary Physical And Sole Legal Custody, Psychological Evaluation Of The Plaintiff	2	405 - 419



**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
04/02/2020	Opposition To Plaintiff's Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate; For Attorney's Fees And Costs And Related Relief And Countermotion For An Order To Show Cause, Compensatory Visitation Time, And Attorney's Fees	9	2007 - 2028
03/16/2020	Opposition To Plaintiff's Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Counter Motion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	8	1857 - 1878
01/03/2020	Opposition To Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief; And Countermotion To Restore Joint Physical Custody And For Attorney's Fees	7	1637 - 1660
04/27/2021	Opposition To Plaintiff's Motion In Limine	13	2878 - 2884
10/20/2020	Opposition To Plaintiff's Motion To Clarify Court's June 30th Order After Hearing	12	2647 - 2657
07/04/2021	Order (April 30, 2021 Hearing)	14	3216 - 3219
08/08/2021	Order (July 8, 2021 Hearing)	15	3288 - 3292
10/20/2021	Order (September 27, 2021)	15	3370 - 3373
05/13/2020	Order After Hearing February 26, 2020	10	2204 - 2211
10/03/2019	Order After Hearing Of August 1, 2019	3	703 - 707
08/21/2019	Order After Hearing Of June 17, 2019	3	525 - 531
05/03/2019	Order After Hearing Of March 19, 2019	1	236 - 250
12/12/2019	Order After Hearing Of October 3, 2019	7	1545 - 1548
11/22/2019	Order After Hearing Of September 6, 2019	6	1223 - 1225
02/07/2019	Order For Family Mediation Center Services	1	86
05/09/2022	Order From April 14, 2022 Motion Hearing	17	3743 - 3746
04/22/2020	Order From April 6, 2020 Hearing	9	2075 - 2078
02/06/2020	Order From December 9, 2019 Hearing	8	1767 - 1774
03/09/2021	Order From February 18, 2021 Hearing	13	2785 - 2789
02/08/2022	Order From January 21, 2022 Trial	16	3578 - 3581
07/06/2020	Order From June 1, 2020 Hearing	11	2455 - 2462
09/10/2020	Order From June 30, 2020 Hearing	11	2575 - 2578
05/04/2021	Order From March 30, 2021 Hearing	13	2946 - 2949
07/04/2021	Order From May 10, 2021	14	3220 - 3225
08/19/2020	Order From The Hearing Held October 9, 2019	11	2563 - 2565
01/22/2020	Order On Discovery Commissioner's Report And Recommendations	7	1663 - 1664
02/19/2020	Order On Discovery Commissioner's Report And Recommendations	8	1792 - 1799
05/31/2022	Order Re: Stay	18	3973 - 3977
02/26/2020	Order Referring To Judicial Settlement Program	8	1854 - 1855
02/07/2019	Order Setting Case Management Conference And Directing Compliance With NRC 16.2	1	76 - 85

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
09/16/2019	Order Setting Case Management Conference And Directing Compliance With NRCP 16.2	3	651 - 652
09/04/2019	Order Shortening Time	3	625 - 626
10/01/2019	Order Shortening Time	3	679 - 680
11/21/2019	Order Shortening Time	5	1180 - 1181
04/01/2020	Order Shortening Time	9	1997 - 1998
06/22/2020	Order Shortening Time	11	2385 - 2386
10/21/2020	Order Shortening Time	12	2677 - 2679
03/23/2021	Order Shortening Time	13	2816 - 2818
06/28/2021	Order Shortening Time	14	3208 - 3210
09/22/2021	Order Shortening Time	15	3357 - 3359
03/16/2022	Order Shortening Time	16	3623 - 3625
06/04/2021	Order Shortening Time On Hearing For Plaintiff's Motion To Disqualify	14	3119 - 3121
08/10/2020	Order To Continue Trial	11	2553 - 2556
03/12/2019	Order To Seal Records Pursuant To NRS 125.110(2)	1	185 - 186
05/27/2020	Order To Show Cause	10	2318 - 2320
02/20/2020	Order To Withdraw As Counsel Of Record	8	1810 - 1811
09/24/2021	Order To Withdraw As Counsel Of Record	15	3360 - 3363
03/18/2022	Pecos Law Group's Memorandum Of Fees And Costs Per Court's Instruction On March 4, 2022	17	3634 - 3742
02/14/2019	Petition To Seal Records Pursuant To NRS 125.110(2)	1	89 - 90
11/13/2020	Plaintiff's Brief Regarding Confidentiality Agreement	12	2705 - 2710
12/31/2019	Plaintiff's Brunzell Affidavit For Attorney's Fees And Costs	7	1581 - 1629
07/08/2021	Plaintiff's Financial Disclosure Form	14	3240 - 3250
03/04/2022	Plaintiff's Financial Disclosure Form	16	3593 - 3603
05/15/2019	Plaintiff's Initial Expert Witness List	2	392 - 400
03/12/2021	Plaintiff's List Of Contested Art In His Possession And Art Believed To Be In Defendant's Possession	13	2797 - 2798
04/26/2020	Plaintiff's Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician's Directive, For Attorney's Fees And Costs And Related Relief	9	2086 - 2099
06/19/2020	Plaintiff's Motion To Address Upcoming Trial Date And Findings In Regard To Chalese's Refusal To Timely Facilitate The Completion Of The Child Custody Evaluation	10	2367 - 2380
10/07/2020	Plaintiff's Motion To Clarify Courts June 30th Order After Hearing	11	2590 - 2595
10/24/2019	Plaintiff's Motion To Compel Discovery Responses And For Attorney's Fees	4	851 - 868
05/13/2021	Plaintiff's Motion To Disqualify	13	3002 - 3016
01/05/2021	Plaintiff's Motion To Reassign	12	2766 - 2732
12/14/2020	Plaintiff's Motion To Terminate Temporary Spousal Support	12	2727 - 2733
12/12/2019	Plaintiff's Notice Of UNLV Seminar Completion EDCR 5.07	7	1556

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
02/26/2019	Plaintiff's Opposition To Amended Motion To Set Aside Default; For Exclusive Possession Of The Marital Residence And Ordering Plaintiff To Assist In Making Mortgage Payments; For Medical Legal Custody Of The Minor Children; For An Order Referring The Parties To Mediation Pursuant To EDCR 5.70, For An Order Awarding Plaintiff Child Support; For An Order Awarding Defendant Alimony; And For Attorney's Fees And Costs Primary Physical Custody, Child Support, And Attorney's Fees And Costs And Countermotion For Joint Legal Custody; Primary Physical Custody To Plaintiff And Supervised Visitation To Defendant; To Establish Child Support; To Establish Payment Of Marital Expenses; For An Order Protecting The Parties Community Property; Defendant To Obtain Employment And To Cooperate In A Vocational Assessment	1	97 - 125
04/29/2021	Plaintiff's Opposition To Defendant's Emergency Motion To Allow Witness To Appear Virtually	13	2885 - 2891
10/20/2020	Plaintiff's Opposition To Defendant's Motion For Clarification And Modification Of Court Release Regarding Custody Evaluation And For Sanctions And Fees Against Plaintiff	12	2658 - 2676
05/03/2021	Plaintiff's Pre-Trial Memorandum	13	2920 - 2945
11/29/2019	Plaintiff's Reply In Support Of Motion To Compel Discovery Responses And For Attorney's Fees	6	1333 - 1345
01/23/2020	Plaintiff's Reply In Support Of Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief; And Opposition To Defendant's Countermotion To Restore Joint Physical Custody And For Attorney's Fees	8	1672 - 1704
01/09/2019	Proof Of Service	1	10
09/30/2019	Re-Notice Of Hearing For Defendant's Motion To Continue Trial, And For Issuance Of New Trial Management Order, Or In The Alternative To Extend Discovery Deadlines	3	670 - 671
01/06/2020	Receipt Of Check	7	1661
01/06/2020	Receipt Of Check	7	1662
02/28/2020	Receipt Of Check	8	1856
03/20/2020	Receipt Of Check	8	1893
01/25/2022	Receipt of Copy of Transcript	16	3575
12/09/2019	Referral Order For Outsourced Evaluation Services	7	1540
06/11/2019	Reply In Support Of Emergency Motion For A Change Of Custody; For Attorney's Fees And Costs And Related Relief And Opposition To Countermotion For Change Of Custody For Primary Physical And Sole Legal Custody, Psychological Evaluation Of The Plaintiff	2	430 - 453
08/23/2021	Reply In Support Of Emergency Motion To Address Defendant S Intent To Withhold The Minor Children	15	3293 - 3302

**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
04/03/2020	Reply In Support Of Motion For A Change Of Custody Based On Defendant's Endangerment Of The Minor Children; For Marie's Birth Certificate; For Attorney's Fees And Costs And Related Relief And Opposition To Countermotion For An Order To Show Cause, Compensatory Visitation Time, And Attorney's Fees	9	2029 - 2045
05/19/2020	Reply In Support Of Motion For An Order To Permit Plaintiff To Retain The Sick Minor Children Pursuant To Their Pediatrician S Directives; For Attorney S Fees And Costs And Related Relief And Opposition To Countermotion For Make-Up Visitation Time; To Admonish Plaintiff To Abide By Joint Legal Custody Standards; For Attorney S Fees; And Related Relief	10	2223 - 2242
03/30/2020	Reply In Support Of Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Partial Opposition To Countermotion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	9	1897 - 1918
01/19/2022	Reply In Support Of Motion To Expand Discovery To Include Up To Date Appclose Messages And Other Messages Sent By The Defendant	15	3407 - 3415
02/25/2019	Reply To Counterclaim For Divorce	1	93 - 96
03/18/2019	Reply To Opposition And Countermotion	1	192 - 195
12/06/2019	Reply To Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief And Opposition To Countermotion For Attorney's Fees And Costs	6	1406 - 1415
11/04/2019	Reply To Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Attorney's Fees And Opposition To Countermotion For Attorney's Fees And Costs	4	869 - 888
06/25/2021	Reply To Opposition To Emergency Motion Regarding Summer Custodial Timeshare	14	3171 - 3176
06/02/2021	Reply To Opposition To Motion To Disqualify And Opposition To Countermotion For Fees And Sanctions	14	3054 - 3069
01/04/2021	Reply To Opposition To Motion To Terminate Temporary Spousal Support And Opposition To Countermotion	12	2754 - 2765
11/09/2020	Reply To Opposition To Plaintiff's Motion To Clarify Court's June 30th Order After Hearing	12	2695 - 2702
08/05/2020	Reply To Plaintiff's Non-Opposition To Defendant's Motion To Continue Trial And Opposition To Plaintiff's Countermotion For Sanctions	11	2544 - 2552
12/02/2019	Reply To Plaintiff's Opposition To Mr. Lloyd's Motion For Protective Order And Countermotion For Attorney's Fees And Costs	6	1346 - 1373
12/27/2021	Request And Order To Release Records	15	3398 - 3400
02/26/2020	Request For Child Protection Service Appearance And Records	8	1853
01/04/2019	Request For Issuance Of Joint Preliminary Injunction	1	7

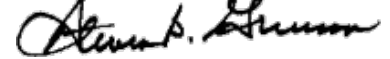
**ALPHABETICAL INDEX**

<b>FILED</b>	<b>DOCUMENT</b>	<b>VOL.</b>	<b>PAGES</b>
09/08/2022	Request For Rough Draft Transcript	18	3988 - 3990
02/12/2020	Request For Submission Of Motion To Withdraw As Counsel Of Record	8	1785 - 1786
11/12/2019	Response In Support Of Opposition	4	944 - 971
05/24/2021	Response To Defendant's Motion To Disqualify Judge	14	3048 - 3051
06/07/2020	Schedule Of Arrearages	10	2363 - 2366
12/06/2019	Second Supplemental Appendix Of Exhibits In Support Of Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	7	1496 - 1536
04/22/2019	Stipulation And Order Modifying Timeshare	1	227 - 229
11/13/2020	Stipulation And Order Regarding Confidentiality Agreement	12	2711 - 2717
06/29/2020	Stipulation And Order Regarding Orders To Show Cause	11	2435 - 2437
03/31/2020	Stipulation And Order To Provide CPS Records And Drug Test Results To The Child Custody Evaluator	9	1988 - 1990
07/21/2020	Stipulation And Order To Withdraw	11	2488 - 2490
08/28/2019	Substitution Of Attorneys	3	568 - 570
04/02/2020	Substitution Of Attorneys	9	2004 - 2006
02/20/2020	Substitution Of Attorney	8	1812 - 1814
01/09/2019	Summons	1	8 - 9
02/24/2020	Supplemental Appendix Of Exhibits In Support Of Plaintiff's Motion For Reconsideration Of The Court's December 9, 2019 Decision; For Proof Of Chalese's Auto Insurance For The Last Year; And Related Relief	8	1833 - 1849
03/30/2020	Supplemental Appendix Of Exhibits In Support Of Plaintiff's Reply In Support Of Motion For An Order To Show Cause And To Hold Defendant In Contempt Of Court For Violation Of The March 19, 2019 Order, The June 17, 2019 Order, And The Behavior Order Filed March 19, 2019; For Attorney's Fees And Costs And Related Relief And Partial Opposition To Countermotion To Enforce Phone Contact With The Minor Children And For Attorney's Fees	9	1919 - 1959
11/21/2019	Supplemental Appendix Of Exhibits In Support Of Plaintiff's Response In Support Of Opposition To Defendant's Motion For Temporary Spousal Support And Preliminary Fees And Costs	5	1182 - 1192
12/06/2019	Supplemental Declaration To Reply To Opposition To Defendant's Motion For A Custody Evaluation, Attorney's Fees, And Related Relief And Opposition To Countermotion For Attorney's Fees And Costs	7	1537 - 1539
11/02/2022	Transcript from April 14, 2022 Hearing (Trial Decision)	22	4771 - 4791
11/02/2022	Transcript from January 21, 2022 Evidentiary Hearing (Trial Day 2)	19	3994 - 4155
11/02/2022	Transcript from March 1, 2022 Evidentiary Hearing (Trial Day 3)	20	4156 - 4402
11/02/2022	Transcript from March 2, 2022 Evidentiary Hearing (Trial Day 4)	21	4403 - 4669
11/02/2022	Transcript from March 3, 2022 Evidentiary Hearing (Trial Day 5)	22	4670 - 4770
01/25/2022	Transcript from May 10, 2021 Evidentiary Hearing (Trial Day 1)	16	3416 - 3574

FDF

Name: Louis C. Schneider, Esq.  
Address: 430 So. 7th Street  
Las Vegas Nevada 89101  
Phone: 702-435-2121  
Email: lcsllawllc@gmail.com  
Attorney for Defendant  
Nevada State Bar No. 9683

Electronically Filed  
7/15/2019 5:31 PM  
Steven D. Grierson  
CLERK OF THE COURT



Eighth Judicial District Court  
Clark County, Nevada

<u>ADAM MICHEAL SOLINGER</u> <b>Plaintiff,</b>  <b>vs.</b> <u>CHALESE MARIE SOLINGER</u> <b>Defendant.</b>	Case No. <u>D-19-582245-D</u>  Dept. <u>I</u>
---------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------

### GENERAL FINANCIAL DISCLOSURE FORM

#### A. Personal Information:

1. What is your full name? (*first, middle, last*) Chalese Marie Solinger
2. How old are you? 28
3. What is your date of birth? 11-17-1990
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)
5-15-19	cookie cutters	stylist	4-5 days	10 am-5/6 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: stay at home mom Date of Hire: \_\_\_\_\_ Date of Termination: \_\_\_\_\_  
Reason for Leaving: \_\_\_\_\_

## Monthly Personal Income Schedule

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

As of the pay period ending 6-23-2019 my gross year to date pay is 1,033.56.

### B. Determine your Gross Monthly Income.

Hourly Wage

\$10.00	×	30.00	=	\$300.00	×	52	=	\$15,600.00	÷	12	=	\$1,300.00
Hourly Wage		Number of hours worked per week		Weekly Income		Weeks		Annual Income		Months		Gross Monthly Income

Annual Salary

\$0.00	÷	12	=	\$0.00
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	once	\$1,330.00	\$1,330.00
Child Support			
Workman's Compensation			
Other: _____			
<b>Total Average Other Income Received</b>			<b>\$1,330.00</b>

<b>Total Average Gross Monthly Income (add totals from B and C above)</b>	<b>\$2,630.00</b>
---------------------------------------------------------------------------	-------------------

**D. Monthly Deductions**

	Type of Deduction	Amount
1.	Court Ordered Child Support (automatically deducted from paycheck)	
2.	Federal Health Savings Plan	
3.	Federal Income Tax	
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			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				
Auto Insurance				
Car Loan/Lease Payment				
Cell Phone	80.00	✓		
Child Support (not deducted from pay)				
Clothing, Shoes, Etc...				
Credit Card Payments (minimum due)	25.00	✓		
Dry Cleaning				
Electric	151.00	✓		
Food (groceries & restaurants)	200.00	✓		
Fuel	150.00	✓		
Gas (for home)	27.79	✓		
Health Insurance (not deducted from pay)				
HOA				
Home Insurance (if not included in mortgage)				
Home Phone				
Internet/Cable				
Lawn Care				
Membership Fees				
Mortgage/Rent/Lease	330.00	✓		
Pest Control				
Pets	100.00	✓		
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer	45.63			
Student Loans				
Unreimbursed Medical Expense				
Water				
Other:				
<b>Total Monthly Expenses</b>	1,109.42			

### Household Information

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

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 <sup>st</sup>	Michael	6-16-15	both	yes	no
2 <sup>nd</sup>	Marie	8-28-17	both	yes	no
3 <sup>rd</sup>					
4 <sup>th</sup>					

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

Type of Expense	1 <sup>st</sup> Child	2 <sup>nd</sup> Child	3 <sup>rd</sup> Child	4 <sup>th</sup> Child
Cellular Phone	0.00	0.00		
Child Care	0.00	0.00		
Clothing	100.00	100.00		
Education	0.00	0.00		
Entertainment				
Extracurricular & Sports	0.00	0.00		
Health Insurance (if not deducted from pay)	0.00	0.00		
Summer Camp/Programs	0.00	0.00		
Transportation Costs for Visitation				
Unreimbursed Medical Expenses	0.00	0.00		
Vehicle				
Other: _____				
<b>Total Monthly Expenses</b>	<b>100.00</b>	<b>100.00</b>	<b>0.00</b>	<b>0.00</b>

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

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc...)	Monthly Contribution
Josh lloyd	27	significant other	

### 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	
<b>Total Value of Assets (add lines 1-15)</b>		<b>\$ 0.00</b>	-	<b>\$ 0.00</b>	=	<b>\$ 0.00</b>	

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.	capital one cc	\$ 233.00	Chalese Solinger
2.	capital one	\$ 1,022.00	Chalese Solinger/ Josh Lloyd
3.	citi bank (costco)	\$ 371.00	Chalese Solinger/ Josh Lloyd
4.		\$	
5.		\$	
6.		\$	
<b>Total Unsecured Debt (add lines 1-6)</b>		<b>\$ 1,626.00</b>	

## 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 \$ \_\_\_\_\_.
4. I currently owe my attorney a total of \$ \_\_\_\_\_.
5. I owe my prior attorney a total of \$ \_\_\_\_\_.

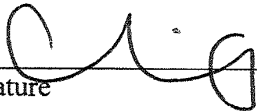
**IMPORTANT:** Read the following paragraphs carefully and initial each one.

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

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

\_\_\_\_\_ 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

6/27/2019  
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) July 15, 2019, service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

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

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

Vincent Mays, Esq. VMGroup@theabramslawfirm.com

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


herein to: \_\_\_\_\_

Executed on the 15<sup>th</sup> day of July, 2019.

[Signature]  
Signature

3:37



Done Paystub\_DD1312\_from\_Haircu... 

Haircuts for Kids LLC  
7345 S. Durango, #110  
Las Vegas NV 89113

Chalese Solinger  
8500 Highland View Ave  
Las Vegas, NV 89145

Direct Deposit

Employee Pay Stub		Check number: DD1312		Pay Period: 05/12/2019 - 06/09/2019		Pay Date: 06/12/2019	
Employee				Status (Fed/State)		Allowances/Extra	
Chalese Solinger, 8500 Highland View Ave, Las Vegas, NV 89145				Single (none)		Fed: 900/hv-000	
Earnings and Hours		Qty	Rate	Current	YTD Amount	Direct Deposit	Amount
Hourly BR		42.36	10.00	426.60	571.80	Checking - *****1241	457.60
Reported Cash Tip				38.90	72.92		
		42.36		465.50	644.72	Memor	
Taxes				Current	YTD Amount	Direct Deposit	
Medicare Employee Add'l Tax				0.00	0.00		
Federal Withholding				0.00	0.00		
Social Security Employee				-35.72	-62.38		
Medicare Employee				-7.16	-12.55		
				-37.88	-74.93		
Net Pay				427.62	609.79		

Haircuts for Kids LLC, 7345 S. Durango, #110, Las Vegas NV 89113

Powered by Intuit Payroll




7/15/2019

image3.png

3:38



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Haircuts for Kids LLC  
7345 S. Durango, #110  
Las Vegas NV 89113

Chelsey Solinger  
8500 Highland View Ave  
Las Vegas, NV 89145

Direct Deposit


Employee Pay Stub		Check number: DD 1324		Pay Period: 06/24/2019 - 07/07/2019		Pay Date: 07/16/2019	
Employee				Status (Fed/State)		Allowances/Extra	
Chelsey Solinger, 8500 Highland View Ave, Las Vegas, NV 89145				Single (none)		Fed: 0/0 NV: 0/0	
Earnings and Hours		Qty	Rate	Current	YTD Amount	Direct Deposit	Amount
Hourly GR		36.13	40.00	1445.17	1,241.83	Checking - *****(1324)	352.53
Referred Cash Tips				20.00	173.80		
		36.13		382.17	1,415.73		
Taxes				Current	YTD Amount	Memo	
						Direct Deposit	
Medicare Employee Adm Tax				0.00	0.00		
Federal Withholding				0.00	0.00		
Social Security Employee				-23.75	-97.70		
Medicare Employee				-5.64	-20.54		
				-29.24	-108.31		
Net Pay				352.93	1,307.42		

Haircuts for Kids LLC 7345 S. Durango, #110, Las Vegas NV 89113

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Haircuts for Kids LLC  
7345 S. Durango, #110  
Las Vegas NV 89113

Chalese Solinger  
8500 Highland View Ave  
Las Vegas, NV 89145

Direct Deposit

Employee Pay Stub		Check number: DD1318		Pay Period: 06/16/2019 - 06/23/2019		Pay Date: 06/26/2019	
Employee				Status (Fed/State)		Allowances/Extra	
Chalese Solinger, 8500 Highland View Ave, Las Vegas, NV 89145				Single/None		Fed-50/None-0.0	
Earnings and Hours		Qty	Rate	Current	YTD Amount	Direct Deposit	Amount
Hourly GR		30.59	10.00	305.93	361.66	Checking - *****0241	352.68
Regular Cash Tip				22.30	161.90		
		30.59		382.23	1,075.55	Memo	
Taxes				Current	YTD Amount	Direct Deposit	
Medicare Employee Auto Tax				0.00	0.00		
Federal Withholding				0.00	0.00		
Social Security Employee				-23.70	-64.08		
Medicare Employee				-8.55	-24.95		
				-29.25	-79.03		
Net Pay				352.98	954.49		

Haircuts for Kids LLC, 7345 S. Durango, #110, Las Vegas NV 89113

Powered by Intuit Payroll





**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

July 23, 2019

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

---

**July 23, 2019      7:30 AM      Minute Order**

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

**COURT CLERK:** Erica Jimenez

**PARTIES:**

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

<b>JOURNAL ENTRIES</b>
------------------------

**- COURT MINUTE ORDER**

Pursuant to EDCR 5.502 (i) this matter came on before the Court on the Chambers Calendar, for decision without a hearing. Pursuant to EDCR 2.23, this Court can grant the requested relief if there is no opposition timely filed. EDCR 2.20(e) provides in relevant part that failure of the opposing party to serve and file written opposition may be construed as an admission that the motion is meritorious and consent to granting the same

On June 13, 2019, Defendant/Mother filed a Motion for an Order to Show Cause Re: Hold Plaintiff in Contempt for Failing to Allow Defendant's Visitation with the Minor Child the Defendant's Court Hearing Held of March 12th, 2018 Violation of Court Orders; Defendant Should be Awarded Attorney Fees and Costs for Having to File this Motion for an Order to Show Cause.

PRINT DATE:	07/23/2019	Page 1 of 3	Minutes Date:	July 23, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

000512

On June 27, 2019, Plaintiff/Father filed an Opposition and Countermotion.

Due to an Opposition being filed and the matter now being contested, IT IS HEREBY ORDERED that the July 17, 2019 at 2:30 a.m. Hearing be taken off the Chambers Calendar.

IT IS FURTHER ORDERED that Defendant/Mother's Motion and Plaintiff/Father's Opposition is set for August 1, 2019 at 10:30am.

So Ordered.

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

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

August 01, 2019 10:30 AM Motion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

August 01, 2019 10:30 AM Opposition & Countermotion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

September 09, 2019 9:00 AM Calendar Call  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

October 09, 2019 9:00 AM Evidentiary Hearing  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

October 10, 2019 9:00 AM Evidentiary Hearing  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

PRINT DATE:	07/23/2019	Page 2 of 3	Minutes Date:	July 23, 2019
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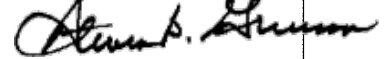
**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

000513

PRINT DATE:	07/23/2019	Page 3 of 3	Minutes Date:	July 23, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

000514



LOUIS SCHNEIDER, ESQ.  
Nevada Bar No.: 9683  
LAW OFFICES OF LOUIS C. SCHNEIDER, LLC  
Email: lcslaw@yahoo.com  
430 South 7th Street  
Las Vegas, NV 89101  
Ph: (702) 435-2121  
Fax: (702) 431-3807  
*Attorney for Defendant*

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

ADAM MICHAEL SOLINGER

Plaintiff,

vs.

CHALESE MARIE SOLINGER

Defendant.

Case No. D-19-582245-D

Dept. I

**MOTION FOR DIVISION OF THE PROCEEDS FROM THE SALE OF THE  
MARITAL HOME; AND FOR ATTORNEY'S FEES.**

Comes now Defendant, CHALESE MARIE SOLINGER, by and through her Attorney, Louis Schneider, Esq., of the Law offices of Louis Schneider, and hereby submits her MOTION FOR DIVISION OF THE PROCEEDS FROM THE SALE OF THE MARITAL HOME; AND FOR ATTORNEY'S FEES.

1  
2 This motion is made and based upon the attached Points and Authorities, the  
3 Affidavit attached hereto, the appendix of Exhibits in support, all papers and pleadings on  
4 file herein, and any oral argument adduced at the hearing of this matter.

5 Dated Tuesday, July 23, 2019.

6 Respectfully Submitted,

7 Law Offices of Attorney Louis Schneider

8 /s/ Louis Schneider, Esq.

9  
10 **Memorandum of Points and Authorities**

11 **I. STATEMENT OF FACTS**

12 Plaintiff, ADAM SOLINGER (“Adam”) and Defendant, CHALESE SOLINGER,  
13 were married on May 12, 2012 in Las Vegas, Nevada. There are two (2) minor children  
14 of the marriage, to wit: Michael Adam Solinger (“Michael”), born June 16, 2015 (3 years  
15 of age); and Marie Leona Solinger (“Marie”), born August 28, 2017 (1 year of age).  
16 Adam is 30 years old and Chalese is 28 years old.

17 The parties sold the Martial home and the funds were deposited into Adam’s  
18 attorney’s trust account. Chalese needs her share of the profit from the sale so that she  
19 can move on with her life and close on a new home to live in. Adam seems to have made  
20 it his mission to torment Chalese every opportunity he gets and continues to try to  
21 control her life but refusing to instruct his attorney to release the funds. The Plaintiff has  
22 never claimed the marital home is his sole and separate property and he is well aware  
23 that Chalese has put a deposit on a home and her close date is August 13, 2019. If  
24 Chalese does not receive the funds in time for closing she will lose her earnest money.  
25 Time is of the essence.

1  
2 **ATTORNEY'S FEES**

3 CHALESE SHOULD BE AWARDED ATTORNEY'S FEES Chalese should be  
4 awarded fees and costs. NRS 18.010 Award of attorney's fees. 1. The compensation  
5 of an attorney and counselor for his services is governed by agreement, express or  
6 implied, which is not restrained by law. 2. In addition to the cases where an allowance  
7 is authorized by specific statute, the court may make an allowance of attorney's fees to a  
8 prevailing party: (a) When he has not recovered more than \$20,000; or (b)  
9 Without regard to the recovery sought, when the court finds that the claim, counterclaim,  
10 cross-claim or third-party complaint or defense of the opposing party was brought  
11 or maintained without. Further reasonable ground or to harass the prevailing party. The  
12 court shall liberally construe the provisions of this paragraph in favor of  
13 awarding attorney's fees in all appropriate situations. It is the intent of the Legislature  
14 that the court award attorney's fees pursuant to this paragraph and impose sanctions  
15 pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate situations  
16 to punish for and deter frivolous or vexatious claims and defenses because such claims  
17 and defenses overburden limited judicial resources, hinder the timely resolution of  
18 meritorious claims and increase the costs of engaging in business and providing  
19 professional services to the public. 3. In awarding attorney's fees, the court  
20 may pronounce its decision on the fees at the conclusion of the trial or special  
21 proceeding without written motion and with or without presentation of  
22 additional evidence. 2. Subsections 2 and 3 do not apply to any action arising out of a  
23 written instrument or agreement which entitles the prevailing party to an award of  
24 reasonable attorney's fees. Chalese has unnecessarily incurred substantial fees to  
25 bring forward this Motion, and Adam should be ordered to pay those fees. The  
26 reasonableness of counsel's fees are assessed in light of the factors recited in Brunzell v.  
27 Golden Gate National Bank, 85 Nev. 345, 455 P.2d 31 (1969) and Miller v.

1  
2 Wilfong, 121Nev. 619, 119 P.3d 727 (2005). The factors include: Qualities of the  
3 advocate;1. Character of the work to be done;1. Work actually performed by the lawyer;  
4 and2. The result. In this case, Chalese's attorney practices primarily in the area of Family  
5 Law, and he is in good standing with the Nevada State Bar. It was necessary to file this  
6 Motion because of the actions of the Plaintiff. In doing so, Counsel consulted with his  
7 client, and did appropriate investigation and research to file the instant Motion.

8  
9 **Conclusion**

10 Based on the foregoing, Chalese respectfully requests that this Honorable Court  
11 grant the relief requested in this Motion, consisting of the following:

- 12 (1) Release of a funds from sale marital home,  
13 (2) Attorney's fees granted to Chalese; and  
14 (3) Any other relief the Court deems proper and just.

15  
16 Dated Tuesday, July 23, 2019.

17 Respectfully Submitted,

18  
19 Law Offices of Attorney Louis Schneider  
20 /s/ Louis Schneider, Esq.\_\_\_\_\_

21  
22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

AFFIDAVIT OF CHALESE MARIE SOLINGER

STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

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

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

2. I make this affidavit in support of the foregoing MOTION FOR DIVISION OF  
THE PROCEEDS FROM THE SALE OF THE MARITAL HOME; AND FOR  
ATTORNEY'S FEES.

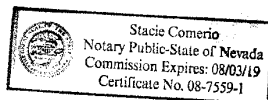
3. I have read said Opposition and hereby certify that the facts set forth in the  
Points and Authorities attached thereto are true of my own knowledge, except for those  
matters therein contained stated upon information and belief, and as to those matters,  
I believe them to be true. I incorporate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

FURTHER, AFFIDAVIT SAYETH NAUGHT.

  
CHALESE MARIE SOLINGER

Subscribed and sworn to before me  
this 25<sup>th</sup> day of July, 2019.

  
NOTARY PUBLIC





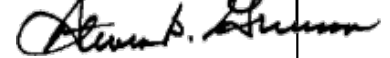
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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Louis C. Schneider, Esq., and that on the 25th Day of July 2019, I served a true and correct copy of the above and forgoing **MOTION FOR DIVISION OF THE PROCEEDS FROM THE SALE OF THE MARITAL HOME; AND FOR ATTORNEY'S FEES.** That was filed electronically with the Eighth Judicial District Court. Electronic Service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Vincent Mayo, Esq.  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Ph: 702. 222-4021  
Fax: 702.248-9750  
Email: VMGroup@theabramslawfirm.com

/s/ Stacie Comerio  
An Employee of Louis C. Schneider, Esq.



1 NEO

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

6 \* \* \*

7  
8 Adam Michael Solinger, Plaintiff  
9 vs.  
10 Chalese Marie Solinger,  
11 Defendant.

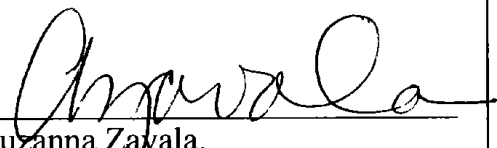
Case No: D-19-582245-D  
Department I

12  
13 **NOTICE OF ENTRY OF JULY 23, 2019 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 July 23, 2019 a true and correct copy of which is attached  
18 hereto.

19  
20  
21 Dated: July 26, 2019

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

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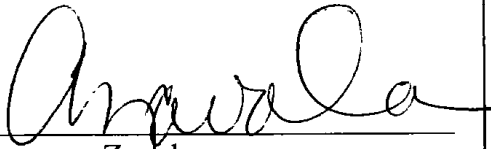
## **CERTIFICATE OF SERVICE**

I hereby certify that on the above file stamp date:

☒ I RESERVED and EMAIL a copy of the foregoing NOTICE OF ENTRY  
OF JULY 23, 2019 MINUTE ORDER to the appropriate attorneys to:

**VINCENT MAYO, ESQ.**  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, NV 89118  
VMGroup@theabramslawfirm.com  
Attorneys for Plaintiff

**LOUIS C. SCHNEIDER, ESQ.**  
430 South 7th Street  
Las Vegas, NV 89101  
lcslaw@yahoo.com  
Attorney for Defendant

  
\_\_\_\_\_  
Suzanna Zavala,  
Judicial Executive Assistant to the  
Honorable Cheryl B. Moss

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

**July 23, 2019**

---

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

---

**July 23, 2019      7:30 AM      Minute Order**

**HEARD BY:** Moss, Cheryl B.

**COURTROOM:** Courtroom 13

**COURT CLERK:** Erica Jimenez

**PARTIES:**

Adam Solinger, Plaintiff, Counter Defendant,      Vincent Mayo, Attorney, not present  
not present

Chalese Solinger, Defendant, Counter      Louis Schneider, Attorney, not present  
Claimant, not present

Marie Solinger, Subject Minor, not present

Michael Solinger, Subject Minor, not present

<b>JOURNAL ENTRIES</b>
------------------------

**- COURT MINUTE ORDER**

Pursuant to EDCR 5.502 (i) this matter came on before the Court on the Chambers Calendar, for decision without a hearing. Pursuant to EDCR 2.23, this Court can grant the requested relief if there is no opposition timely filed. EDCR 2.20(e) provides in relevant part that failure of the opposing party to serve and file written opposition may be construed as an admission that the motion is meritorious and consent to granting the same

On June 13, 2019, Defendant/ Mother filed a Motion for an Order to Show Cause Re: Hold Plaintiff in Contempt for Failing to Allow Defendant's Visitation with the Minor Child the Defendant's Court Hearing Held of March 12th, 2018 Violation of Court Orders; Defendant Should be Awarded Attorney Fees and Costs for Having to File this Motion for an Order to Show Cause.

PRINT DATE:	07/23/2019	Page 1 of 3	Minutes Date:	July 23, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

On June 27, 2019, Plaintiff/Father filed an Opposition and Countermotion.

Due to an Opposition being filed and the matter now being contested, IT IS HEREBY ORDERED that the July 17, 2019 at 2:30 a.m. Hearing be taken off the Chambers Calendar.

IT IS FURTHER ORDERED that Defendant/Mother s Motion and Plaintiff/Father s Opposition is set for August 1, 2019 at 10:30am.

So Ordered.

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

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

August 01, 2019 10:30 AM Motion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

August 01, 2019 10:30 AM Opposition & Countermotion  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

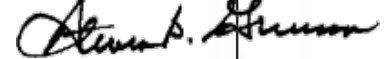
September 09, 2019 9 00 AM Calendar Call  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

October 09, 2019 9:00 AM Evidentiary Hearing  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

October 10, 2019 9:00 AM Evidentiary Hearing  
Moss, Cheryl B.  
Courtroom 13  
Jimenez, Erica

PRINT DATE:	07/23/2019	Page 2 of 3	Minutes Date:	July 23, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**



**ORDR**

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
Plaintiff,	)	Department: I
vs.	)	
	)	Date of Hearing: June 17, 2019
CHALESE MARIE SOLINGER,	)	Time of Hearing: 10:00 a.m.
	)	
Defendant.	)	

**ORDER AFTER HEARING OF JUNE 17, 2019**

This matter coming on for hearing on the on the 17<sup>th</sup> day of June 2019, before the Honorable Cheryl B. Moss, upon Plaintiff's *Emergency Motion for a Change of Custody; for Attorney's Fees and Costs and Related Relief* and Defendant's *Opposition to Plaintiff's Emergency Motion for A Change of Custody/Spousal Support/Child Support, for Attorney's Fees and Costs and Related Relief. Counter Motion for Change of Custody for Primary Physical and Sole Legal Custody. Psychological Evaluation of the Plaintiff*, with Plaintiff, ADAM

1 MICHAEL SOLINGER (hereinafter referred to as "Adam"), having  
2 appeared personally and by and through his attorney of record,  
3 VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM, and  
4 Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as  
5 "Chalese"), having appeared personally and by and through her attorney  
6 of record, LOUIS C. SCHNEIDER, ESQ., or LAW OFFICE OF LOUIS C.  
7 SCHNEIDER and the Court having listened to the representations and  
8 arguments of counsel, and good cause appearing:

9 **IT IS HEREBY NOTED** that discussion by Court and counsel  
10 regarding Defendant/Mother's drug test results being positive for THC  
11 and Mother stating she takes a prescription for 1 mg of Xanax.

12 **IT IS FURTHER NOTED** that Attorney Mayo represented  
13 Mother continues to violate a number of Court orders and  
14 Plaintiff/Father has hired a Private Investigator that witnessed the  
15 violations.

16 **IT IS FURTHER NOTED** that Attorney Schneider represented  
17 Father kept the children away from Mother in violation of the Court's  
18 orders. The Court notes that Father covered his bases and filed an Ex  
19 Parte Motion to address the emergency issue of Mother attempting to  
20 drive the children out of town while admittedly on medication that  
21 prohibits her from driving.

1       **IT IS FURTHER NOTED** that Attorney Schneider further stated  
2 Mother is being harassed as Father has investigated Mother through the  
3 services of a private investigator, including the use of a tracker mounted  
4 to the bottom of her vehicle which Mother claims was turned over to the  
5 police. Father is entitled to retain a private investigator for that purpose  
6 and it is his prerogative to do so.

7       **IT IS FURTHER NOTED** that there was further discussion  
8 regarding the Temporary Protective Order (TPO) cases between  
9 Mother's significant other, Josh, and his ex-significant other.

10       **IT IS FURTHER NOTED** that Father stated the parties lack  
11 communication regarding medical and dental issues with the children.  
12 Further discussion regarding the party's minor daughter's dental  
13 procedures and issues.

14       **IT IS FURTHER NOTED** that based on the information before  
15 the Court, Mother has at least six (6) incidents of violating its order  
16 based on Mother's admissions, violations that implicate safety risk  
17 issues for the children.

18       **IT IS FURTHER NOTED** that Josh has driven the children on  
19 multiple occasions despite the Court ordering Josh was not do so, which  
20 Mother admitted to. This is a credibility issue for the Court in regard to  
21 trusting Mother ensure the Court's orders will be followed on her time.



1       **IT IS FURTHER NOTED** that Mother at least on one occasion  
2 left the children alone with Josh when the Court's order was that Josh  
3 was not to be left alone with the children.

4       **IT IS HEREBY ORDERED** that under a Confidential Gag  
5 Order, the Child Protective Services (CPS) Records were provided to  
6 both Counsel.

7       **IT IS FURTHER ORDERED** that Mother is referred to the  
8 American Toxicology Institute (ATI) for random drug testing, to include  
9 hair and urine, immediately after court today and a maximum of once  
10 per month, effective and commencing on July 1, 2019 until trial. Father  
11 shall notify Mother when she has to test, with Mother testing within four  
12 (4) hours of being notified and with Father bearing the cost without  
13 prejudice. Referral for drug testing is left side filed.

14       **IT IS FURTHER ORDERED** that Father's request for a SCRAM  
15 Bracelet on Mother is denied. If anything shows up positive on today's  
16 Drug Test, the Court may reconsider.

17       **IT IS FURTHER ORDERED** that custody is modified, with  
18 Father having temporary primary physical custody (PPC) of the children.  
19 Father shall have first right of refusal.

20       **IT IS FURTHER ORDERED** that Father's request for  
21 supervised visitation for Mother shall be denied.

1       **IT IS FURTHER ORDERED** that Mother shall have visitation  
2 with the children on an alternating schedule; Wednesdays at 6:00 p.m.  
3 until Friday at 6:00 p.m. and the alternating week Fridays at 6:00 p.m.  
4 until Sundays at 6:00 p.m. Mother shall have both children today  
5 through Wednesday at 6:00 p.m. and then the temporary schedule shall  
6 begin Friday at 6:00 p.m. with Mother. Receiving parent shall pick up.  
7 Any changes in the schedule shall be agreed upon using AppClose.

8       **IT IS FURTHER ORDERED** that Mother can file a motion  
9 requesting make up time, as can Father.

10       **IT IS FURTHER ORDERED** that Father's family support  
11 obligation to Mother shall be \$1,330.00 per month (under protest,  
12 meaning Father will be reimbursed at trial) for the months of July  
13 through September 2019 (Father already paid the \$1,990.00 for June  
14 2019). Counsel will need to figure out Mother's 25% since Father  
15 currently has temporary primary physical custody of the minor children  
16 which would make his obligation zero.

17       **IT IS FURTHER ORDERED** that Court issues a strong  
18 ADMONISHMENT to Mother: Mother's significant other, Joshua Lloyd,  
19 shall not be allowed to drive the children and shall not be left alone with  
20 the children.

21     ///

1       **IT IS FURTHER ORDERED** that Mother shall provide Father  
2 with proof of her valid driver's license, vehicle registration and vehicle  
3 insurance.

4       **IT IS FURTHER ORDERED** that Mother shall enroll in the  
5 UNLV Parenting class today and provide Father proof so he may prepay.

6       **IT IS FURTHER ORDERED** that Mother shall forthwith  
7 complete the live COPE class.

8       **IT IS FURTHER ORDERED** that Mother is referred to Options  
9 for an Anger Management Assessment. Father shall bear the cost and  
10 inform Mother when he has pre-paid. Referral is left side filed.

11       **IT IS FURTHER ORDERED** that Attorney Mayo shall forthwith  
12 provide Attorney Schneider with a full unredacted copy of the Private  
13 Investigator's (PI) report.

14       **IT IS FURTHER ORDERED** that the parties co-parenting  
15 issues shall be reserved for trial.

16       **IT IS FURTHER ORDERED** that discovery shall be ongoing.

17       **IT IS FURTHER ORDERED** that the parties shall use AppClose  
18 for communication.

19       **IT IS FURTHER ORDERED** that to the extent not modified  
20 herein, all prior orders shall remain in effect.

21       ///

1       **IT IS FURTHER ORDERED** that the Calendar Call set for  
2 September 9, 2019 stands.

3       **IT IS FURTHER ORDERED** that the Evidentiary Hearing set  
4 for October 9, 2019 at 9:00 a.m. and October 10, 2019 at 9:00 a.m.  
5 stands. Pursuant to EDCR 7.50, the Order shall be enforceable, effective  
6 immediately.

7       **IT IS FURTHER ORDERED** that Attorney Mayo shall prepare  
8 the Order from today's hearing; Attorney Schneider shall review and  
9 countersign.

10 Dated this \_\_\_\_ day of AUG 19 2019, 2019.

11   
12 DISTRICT COURT JUDGE

13 Respectfully Submitted:

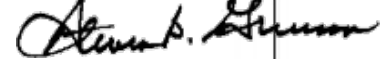
Approved as to form and content:

14 THE ABRAMS & MAYO LAW  
15 FIRM

LAW OFFICE OF LOUIS C.  
16 SCHNEIDER

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

Louis C. Schneider, Esq.  
Nevada State Bar Number: 9683  
430 South Seventh Street  
Las Vegas, Nevada 89101  
21 Tel: (702) 435-2121  
Fax: (702) 431-3807  
Attorney for Defendant



1 **NEOJ**

2 Vincent Mayo, Esq.

3 Nevada State Bar Number: 8564

4 THE ABRAMS & MAYO LAW FIRM

5 6252 South Rainbow Blvd., Suite 100

6 Las Vegas, Nevada 89118

7 Tel: (702) 222-4021

8 Fax: (702) 248-9750

9 Email: VMGroup@theabramslawfirm.com

10 Attorney for Plaintiff

11 Eighth Judicial District Court

12 Family Division

13 Clark County, Nevada

14 ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D

15 Plaintiff, ) Department: I

16 vs. )

17 CHALESE MARIE SOLINGER, )

18 Defendant. )

19 **NOTICE OF ENTRY OF ORDER AFTER HEARING OF**

20 **JUNE 17, 2019**

21 PLEASE TAKE NOTICE that the Order After Hearing of June 17,  
22 2019 was duly entered in the above-referenced matter. A true and correct  
23 copy of said

24 ///

///

///

1 Order is attached hereto.

2 DATED Thursday, August 22, 2019.

3 Respectfully Submitted,

4 THE ABRAMS & MAYO LAW FIRM

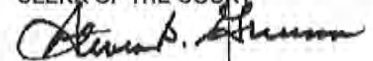
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6  
7 Vincent Mayo, Esq.  
8 Nevada State Bar Number: 8564  
9 6252 South Rainbow Blvd., Suite 100  
10 Las Vegas, Nevada 89118  
11 Attorney for Plaintiff  
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Louis C. Schneider, Esq.  
Attorney for Defendant

An Employee of The Abrams & Mayo Law Firm



1 **ORDR**

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

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

14 ADAM MICHAEL SOLINGER,	) Case No.: D-19-582245-D
15	)
16 Plaintiff,	) Department: I
17 vs.	)
18	) Date of Hearing: June 17, 2019
19 CHALESE MARIE SOLINGER,	) Time of Hearing: 10:00 a.m.
20	)
21 Defendant.	)

22 **ORDER AFTER HEARING OF JUNE 17, 2019**

23 This matter coming on for hearing on the on the 17<sup>th</sup> day of June  
24 2019, before the Honorable Cheryl B. Moss, upon Plaintiff's *Emergency*  
25 *Motion for a Change of Custody; for Attorney's Fees and Costs and*  
26 *Related Relief* and Defendant's *Opposition to Plaintiff's Emergency*  
27 *Motion for A Change of Custody/Spousal Support/Child Support, for*  
28 *Attorney's Fees and Costs and Related Relief. Counter Motion for*  
29 *Change of Custody for Primary Physical and Sole Legal Custody.*  
30 *Psychological Evaluation of the Plaintiff, with Plaintiff, ADAM*



1 MICHAEL SOLINGER (hereinafter referred to as "Adam"), having  
2 appeared personally and by and through his attorney of record,  
3 VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM, and  
4 Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as  
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6 of record, LOUIS C. SCHNEIDER, ESQ., or LAW OFFICE OF LOUIS C.  
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8 arguments of counsel, and good cause appearing:

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16 which would make his obligation zero.

17       **IT IS FURTHER ORDERED** that Court issues a strong  
18 **ADMONISHMENT** to Mother: Mother's significant other, Joshua Lloyd,  
19 shall not be allowed to drive the children and shall not be left alone with  
20 the children.

21       ///

1       **IT IS FURTHER ORDERED** that Mother shall provide Father  
2 with proof of her valid driver's license, vehicle registration and vehicle  
3 insurance.

4       **IT IS FURTHER ORDERED** that Mother shall enroll in the  
5 UNLV Parenting class today and provide Father proof so he may prepay.

6       **IT IS FURTHER ORDERED** that Mother shall forthwith  
7 complete the live COPE class.

8       **IT IS FURTHER ORDERED** that Mother is referred to Options  
9 for an Anger Management Assessment. Father shall bear the cost and  
10 inform Mother when he has pre-paid. Referral is left side filed.

11       **IT IS FURTHER ORDERED** that Attorney Mayo shall forthwith  
12 provide Attorney Schneider with a full unredacted copy of the Private  
13 Investigator's (PI) report.

14       **IT IS FURTHER ORDERED** that the parties co-parenting  
15 issues shall be reserved for trial.

16       **IT IS FURTHER ORDERED** that discovery shall be ongoing.

17       **IT IS FURTHER ORDERED** that the parties shall use AppClose  
18 for communication.

19       **IT IS FURTHER ORDERED** that to the extent not modified  
20 herein, all prior orders shall remain in effect.

21       ///

1       **IT IS FURTHER ORDERED** that the Calendar Call set for  
2 September 9, 2019 stands.

3       **IT IS FURTHER ORDERED** that the Evidentiary Hearing set  
4 for October 9, 2019 at 9:00 a.m. and October 10, 2019 at 9:00 a.m.  
5 stands. Pursuant to EDCR 7.50, the Order shall be enforceable, effective  
6 immediately.

7       **IT IS FURTHER ORDERED** that Attorney Mayo shall prepare  
8 the Order from today's hearing; Attorney Schneider shall review and  
9 countersign.

10 Dated this \_\_\_\_ day of AUG 19 2019, 2019.

11   
12 DISTRICT COURT JUDGE

13 Respectfully Submitted:

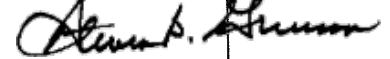
Approved as to form and content:

14 THE ABRAMS & MAYO LAW  
15 FIRM

16 LAW OFFICE OF LOUIS C.  
17 SCHNEIDER

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

21 Louis C. Schneider, Esq.  
Nevada State Bar Number: 9683  
430 South Seventh Street  
Las Vegas, Nevada 89101  
Tel: (702) 435-2121  
Fax: (702) 431-3807  
Attorney for Defendant



1 LOUIS C. SCHNEIDER  
2 Attorney at Law  
3 Nevada Bar Number 9683  
4 430 South 7<sup>th</sup> Street  
5 Las Vegas, Nevada 89101  
6 T: (702) 435-2121  
7 F: (702) 431-3807  
8 [lcsllawllc@yahoo.com](mailto:lcsllawllc@yahoo.com)

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

11 ADAM MICHAEL SOLINGER,

12 Plaintiff,

13 vs.

14 CHALESE MARIE SOLINGER,

15 Defendant.

Case No.: D-19-582245-D

Dept. No.: I


16  
17 NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE  
18  
19 TO THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE  
20  
21 THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN TEN  
22  
23 (10) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A  
24  
25 WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN  
26  
27 (10) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE  
28  
REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT  
HEARING PRIOR TO THE SCHEDULED HEARING DATE.



1 **MOTION TO WITHDRAW AND ADJUDICATE ATTORNEY'S LIEN**

2 COMES NOW, Louis C. Schneider, Esq., attorney for the Defendant,  
3  
4 Chalese Solinger in the above-entitled matter, and moves the court for an order  
5 allowing him to withdraw as attorney for the Defendant and adjudicating the  
6 attorney's lien filed in this matter. Said motion is made pursuant to NRS 18.015  
7 which allows the filing of the lien and allows the court to adjudicate said lien. Said  
8 motion is based upon all pleadings and papers on file herein.  
9

10  
11 DATED this 23 day of August, 2019.

12  
13   
14 Louis C. Schneider, Esq.  
15 State Bar #9683  
16 430 S. 7<sup>th</sup> Street  
17 Las Vegas, Nevada 89101  
18 (702) 435.2121  
19 Attorney for Defendant  
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TO: , VINCENT MAYO, Esq., his attorney:

thereafter as counsel can be heard in Department "I ".

*Attorney for Defendant*

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**POINTS AND AUTHORITIES**

Louis C. Schneider Esq. was retained as attorney for the Defendant, Chalese Solinger, in the above-entitled action. Hourly rates were agreed to be paid for both in and out of court time at the rate of \$450.00 per hour. That the Defendant has agreed that this court has jurisdiction to resolve issues of any attorney's fees disputes between the Defendant and Chalese as in the Fee Agreement attached hereto as Exhibit 1 signed by the client contains the language, "I further agree that if I should fail to make payment of attorney's fees and an attorney's lien is filed and a motion is filed to have the court, in which my case is being heard, adjudicate the lien; then I consent to the court proceeding on the merits of the motion to adjudicate the lien." That attached hereto as Exhibit 2 is a copy of the latest statement in regards to the current outstanding balance owed to Louis C. Schneider, Esq. being **\$15,425.00**. Louis C. Schneider requests to withdraw as attorney for the Defendant. Pursuant to NRS 18.015, upon the filing of the motion, the court, "shall . . . adjudicate the rights of the attorney and enforce the lien." In the case of *Fredianelli v. Price*, 133 Nev. Adv. Opn. 74 (October 5, 2017). The Nevada Supreme Court addressed the issue of adjudicating an attorney lien after the District Court had issued its final order and after the attorney had withdrawn as attorney of record. After the final order and withdrawal, the attorney filed an attorney's lien and a motion to adjudicate the lien. The District Court

1 granted judgment to the attorney. The Nevada Supreme Court upheld the  
2 judgment. In do so, the Nevada Supreme Court stated: "First the Legislature's 2013  
3 amendments to NRS 18.015 created an entirely new statutory method for enforcing  
4 a retaining lien..." "NRS 18.015(4)(b) does not require an affirmative recovery for a  
5 retaining lien to attach...we reject Fredianelli's argument that an affirmative  
6 recovery is necessary in the retaining client's files and property in an attorney's  
7 possession, not to any recovery..." "Third, NRS 18.015(6) provides that on any  
8 attorney's motion, the court shall "adjudicate the rights of the attorney...and  
9 enforce the lien." "The District Court properly adjudicated and enforced Fine's  
10 retaining lien. Fine asserted its lien against Fredianelli upon Fredianelli's papers  
11 and files left in Fine's possession under NRS 18.015(1)(b)...Fine perfected the lien  
12 by properly serving notice of the retaining lien and the amount of the lien...  
13 Therefore, the lien attached to Fredianelli's papers and files..." " We conclude that  
14 the District Court did not err by enforcing Fine's valid retaining lien against  
15 Fredianelli under NRS 18.015..." Therefore, it is requested that the court, pursuant  
16

17 ///

18 ///

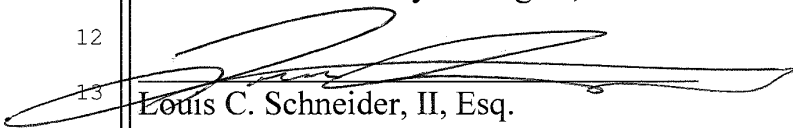
19 ///

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1 to its right under said statute, enter judgment against the Defendant and enforce the  
2 lien upon the rights of the Defendant by directing that Louis C. Schneider be paid  
3 the amount of said lien.  
4  
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7

8 Respectfully submitted,  
9  
10

11 DATED this 23<sup>rd</sup> day of August, 2019.  
12

13  Louis C. Schneider, II, Esq.  
14

15 State Bar #9683

16 430 So. 7th Street

17 Las Vegas, Nevada 89101

18 (702) 435.2121  
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1                                   **AFFIDAVIT OF LOUIS C. SCHNEIDER, ESQ.**


2                   STATE OF NEVADA)

3                                   ) ss:

4                   COUNTY OF CLARK)

5                   **LOUIS C. SCHNEIDER, ESQ.**, being first duly sworn, deposes and says:

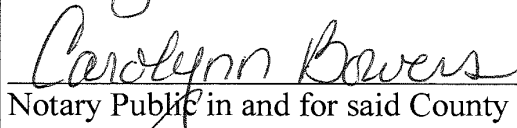
6  
7                   That your Affiant is the attorney for the Defendant, Chalese Solinger, in the above-  
8                   entitled matter at the time of the filing of this motion; has personal knowledge of  
9                   the facts set forth herein; has reviewed the Points and Authorities attached hereto;  
10                  and that all statements contained in the Points and Authorities are true and  
11                  correct to the best of your Affiant's knowledge.  
12

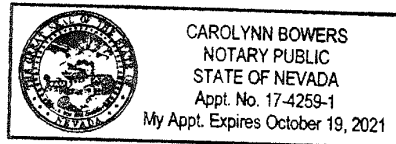
13  
14                     
15                   Louis C. Schneider, Esq.

16  
17                   SUBSCRIBED and SWORN to

18                   before me this 23 day of

19                   August, 2019.

20  
21                     
22                   Notary Public in and for said County and  
23                   State  
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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Louis C. Schneider, Esq. and that  
on the 23rd day of August, 2019, I served a true and correct copy of the above and  
forgoing **MOTION TO WITHDRAW AND ADJUDICATE ATTORNEY'S**

**LIEN** and Related Relief on the parties addressed as shown below:

    X     Via Electronic Service [NEFR Rule 9]

    X     Via U.S. Mail (NRCP 5(b))- Certified Mail- UPS Tracking Number

Vincent Mayo, Esq.

THE ABRAMS & MAYO LAW FIRM

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Ph: 702. 222-4021

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

UPS Tracking Number 9590 9402 3768 8032 6325 61

Bruce I. Sharipo, Esq.

PECOS LAW GROUP

8925 South Pecos Road Suite 14A

Henderson, Nevada 89074

Ph: 702.388.1851

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

UPS Tracking Number 9590 9402 3768 8032 6325 78

Chalese Solinger

8500 Highland Avenue

Las Vegas, Nevada 89145

UPS Tracking Number 9590 9402 3768 8032 6325 85

/s/ Stacie Comerio  
An Employee of Louis C. Schneider, Esq.

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**EXHIBIT 1.**  
**REPRESENTATION AGREEMENT- LAW OFFICE OF LOUIS C.**  
**SCHNEIDER**

# Law Office of Louis C. Schneider, LLC

Nevada Bar Number: 9683

430 South 7<sup>th</sup> Street

Las Vegas, NV 89101

Phone: (702) 435-2121 • Fax: (702) 431-3807

[lcsllawllc@yahoo.com](mailto:lcsllawllc@yahoo.com)

[www.lcslawfamily.com](http://www.lcslawfamily.com)

## REPRESENTATION AGREEMENT

This Representation Agreement ("Agreement") is entered into on this 11 day of December, 2018 by and between the Law Office of Louis C. Schneider (hereinafter referred to as "Firm", "the firm", or "Counsel"), located at 430 South 7<sup>th</sup> Street, Las Vegas, NV 89101, and Chalese Solinger (hereinafter referred to as "client"). Upon execution of this Agreement and payment in full or in agreed-upon part, you have represented the services of attorney Louis C. Schneider.

## SCOPE OF ENGAGEMENT

Client hereby retains Attorney Louis C. Schneider, Esq., to perform specific legal services and representation set forth as follows:

Re: Divorce / Custody  
Retainer in the amount of: \$ 5,000.00

The legal services described above shall be referred to collectively herein as the "Scope of Engagement". The Firm's representation of Client is limited to matters listed above and no other matters. Client has informed Firm either that Client has not retained the services of another attorney for such matters, or that Client's request has been made with the consent of such other attorney. Client may engage Firm to represent Client in different or additional matters and the terms of this Agreement shall apply to all such representation unless separate written Agreement is executed. Client agrees that additional services requested by Client that are not addressed in *this* agreement may incur additional retainer fees.

Initials: LCS CS  
Firm Client

Page | 1

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The shareholder executing this Agreement on behalf of Counsel will be the attorney supervising the representation of Client; however, other paralegals may assist in the representation of Client. Counsel will attempt to communicate expeditiously with Client as to significant developments, will communicate all settlement offers promptly to Client, and will compromise or settle Client's claims only with Client's consent.

**It is expressly understood that the timetable for performance is within the sole discretion and control of any appropriate court, and that COUNSEL CAN IN NO WAY PROMISE OR GUARANTEE THE OUTCOME OF ANY CONTESTED MATTER.**

Client agrees to cooperate fully with Counsel and to provide all information known by, or available to, Client, which may aid Counsel in representing Client in the matter, and to keep Counsel's office informed of Client's current address, telephone number, and email address. It is the Client's sole responsibility to inform the Firm of any changes to their contact information. The Firm will not be held liable for the consequences of Client's failure to inform the Firm of said change.

### **LEGAL FEES AND EXPENSES**

The Firm's billing practices and charges take into account many items. Client agrees to pay for legal services as follows:

- Louis C. Schneider\* - \$450 per hour.
- Legal Secretary/Paralegal - \$150 per hour.
- Expenses (i.e. filing fees, court fees, witness fees, etc.) will be invoiced as needed.

Client agrees to pay in full the amount of any bill in excess of their retainer within fifteen (15) days of the billing date. Any outstanding balances not paid when due as agreed above will accrue an interest charge of twelve percent (12%) per annum, compounded monthly, from the due date until paid in full. Any credit card payments are subject to a three percent (3%) services charge. All returned checks will result in a \$25.00 processing fee.

\*Attorney Louis Schneider, as a general practice, will be the attorney to actually attend court hearings with Client, however, due to varying schedules and unforeseen circumstances, in rare instances, Louis Schneider may have a scheduling conflict and could be unavailable for a court appearance. In these special circumstances, the Firm will arrange for another licensed attorney to accompany Client to court at the Firm's expense. The Client will not be charged a fee in these instances.

Initials:   LCS          OO    
            Firm              Client

The Firm may require additional retainers at any time when, at the sole discretion of the Firm, a retainer in the amount determined by the Firm is necessary to protect the Firm's right to payment.

For all civil cases: The Firm will hold all retainers as security for payment of the Firm's final bill. At the conclusion of representation, any remaining balance, if any, shall be promptly refunded to the Client after payment of the Firm's final invoice.

For all criminal cases: Retainer is considered to be *Earned Upon Receipt* and is non-refundable.

Client is advised that in the event that this matter goes to trial and the finding is for the other party, Client may be liable for opposing party's fees & costs. Client is advised that any legal action or lawsuit brought solely to harass or to coerce a settlement may result in liability for malicious prosecution or abuse.

In the discharge of the Firm's responsibility, it may be necessary for the Firm to incur expenses for various items including, but not limited to, filing fees, expert witness testimony, support services, long-distance telephone calls, postage, travel, office supplies, process service, and delivery services. These items will be charged to each individual Client for whose benefit they are incurred. Client is responsible for the current and timely payment of all such expenses, costs and disbursements.

### TERMS OF PAYMENT

It is the Firm's practice to periodically send a statement for expenses and disbursements incurred on the Client's account. The detail in the statement will inform the Client of both the nature of the litigation-related fees (as discussed above) and disbursements incurred. If Client has questions about any fee, it should be raised with the Firm promptly for discussion, however the Firm reserves its right to receive payment for services rendered.

### TERMINATION

This Agreement may be prospectively terminated at any time upon reasonable advance written notice given by either party. Further, the Firm may withdraw from representing the Client at any time as

Initials: LCS OO  
Firm Client

Page | 3

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authorized under the Supreme Court Rules of Nevada, under the same terms and conditions. Client also agrees that the Firm shall be under no obligation to undertake or continue serves on any matter if the Firm deems such services to be in conflict with the interest of the Firm, any other Client, or with legal ethics; or if the Client fails to make any payment to the Firm when due.

### CONFLICT OF INTEREST

The Firm has performed a Conflict of Interest check and has determined that there is no conflict with representing the Client in this matter. However, should the Client believe that there are or will be other parties with a direct economic or personal interest relating to the Firm's representation, which have not been previously disclosed to the Firm, Client agrees to immediately contact the Firm with such information. The Firm may not represent multiple Clients who have directly adverse interests without first explaining the facts and circumstances that give rise or may give rise to the conflict and obtaining their informed written consent.

### POWER OF ATTORNEY AND ATTORNEY LIEN

As long as the Firm represents the Client in the matter herein, the Client grants the Firm a Power of Attorney to act on Client's behalf and to execute all claims, contracts, compromises, releases, and verifications in every respect as though Client were personally doing so.

Client hereby grants the Firm a lien against any attorney work product as well as any proceeds Client receives or may receive from the course of this legal representation.

### RESULTS

The Client understands that the Firm HAS NOT, WILL NOT, AND CANNOT guarantee results, and that the Firm's services shall be to give the Client legal advice and advocate Client's position about the matters described herein.

Initials: LOS CO  
Firm Client

### NO CONTINUING OBLIGATION

Once the legal work reference on the first page of this Agreement is complete, the Firm has no obligation to inform Client of future developments relative to legal work performed hereunder. It is advised that Client periodically consult with an attorney with regard to any such future developments. In addition, it is advisable for Client to consult with an attorney if there is a significant change in Client's circumstances.

### SEVERABILITY

Every provision of this Agreement is severable. If any provision hereof is held to be illegal or invalid for any reason whatsoever, such illegality or invalidity shall not affect the validity of the remainder of this Agreement.

### ARBITRATION

Unless the parties hereto agree otherwise, any controversy between the Firm and the Client shall be submitted to binding arbitration upon the written request of one party after the service of that request on the other party. The parties to such arbitration shall comply with the rules of the American Arbitration Association.

### MALPRACTICE CLAIM SUBJECT TO ARBITRATION

If Client claims that the Firm performed any legal services improperly, negligently, or incompetently, then Client hereby agrees to submit the dispute to binding arbitration. By agreeing to this provision, Client understands that Client waives the right to bring an action against Counsel in a Court of Law and further waives the right to a jury trial. The cost of any such arbitration shall be borne by the losing party or in such proportion as the arbitrators shall decide. The parties to such arbitration shall comply with the rules of the American Arbitration Association.

Initials: LOS OS  
Firm Client

### APPLICABLE LAW AND VENUE

The interpretation of this Agreement is governed by the laws of the State of Nevada. The Venue is the Eighth Judicial District of Nevada.

### INTEGRATED AGREEMENT

This Agreement and the documents executed or delivered in connection therewith constitute the entire understanding and agreement between the parties hereto with respect to the subject matter hereof. There are no agreements, understandings, restrictions, representations, or warranties other than those set forth or referred to herein.

### MODIFICATION

This Agreement reflects the standard terms upon which the Firm currently makes its services available to Client. In the event that such standard terms are modified in the future, this Agreement may be amended by the Firm to reflect such modified standard terms. No separate modification of this Agreement is necessary to affect such a change. If Client agrees and desires to continue to receive services from the Firm under the new standard terms, no further action evidencing this need be taken by Client. If Client does not agree to receiving services under the amended standard terms, Client may, within 21 days of notification of amended standard terms, and in writing, exercise their right to unilaterally terminate this Agreement by giving written notice to the Firm pursuant to the Termination Clause contained herein.

### Consent to Jurisdiction

The Client hereby expressly consents to the jurisdiction of the Court in which this matter is filed to adjudicate any and all disputes regarding attorney fees and costs. Specifically, if attorney has a charging lien (a lien on any settlement), or a retaining lien (a lien on files), client hereby agrees to have the Court in which this case is filed adjudicate the amount of attorney fees and/or costs owed to attorney, and attorney **WILL NOT** be required to file a separate action in a different case and/or court based on this contract.

Initials: LCS      06  
Firm                      Client

### HOURLY RATE

The Client hereby agrees that the hourly rate of \$450.00 is reasonable for the area of Clark County, Nevada.

### CONDITION

This agreement will not take effect and Counsel will have no obligation to provide legal services until Client signs the Agreement and pays the **full retainer amount indicated on the first page.**

THE FIRM AGREES TO REPRESENT CLIENT AS PROVIDED IN THIS AGREEMENT.



LOUIS C. SCHNEIDER, ESQ.

For the Law Office of Louis C. Schneider, LLC.

12/11/18  
DATED

I AGREE TO THE TERMS OF REPRESENTATION AND ENGAGEMENT  
AS OUTLINED IN THIS AGREEMENT

Chalese Solinger  
CLIENT NAME (PRINTED)

[Signature]  
CLIENT SIGNATURE

12/11/18  
DATED

☐ **THIRD PARTY DISCLAIMER OF PAYMENT(S)**

By signing below, you acknowledge and understand Attorney / Client Privilege and the right to discuss or direct legal services rests solely and exclusively with the Client(s), regardless of who pays for the services. Third parties (including the relatives, spouses, significant others and parents of minor children) have no legal rights to any information regarding cases unless disclosure is permitted by the Client and that a waiver of the Attorney / Client Privilege will not harm the Client.

\_\_\_\_\_  
THIRD PARTY NAME (PRINTED)

\_\_\_\_\_  
THIRD PARTY SIGNATURE

\_\_\_\_\_  
DATED

Initials:

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**EXHIBIT 2.**  
**BILLING INVOICE FROM LAW OFFICE OF LOUIS C. SCHNEIDER**

LAW OFFICE OF LOUIS C. SCHNEIDER  
430 S. 7th Street

Las Vegas, Nevada 89101  
CHALESE SOLINGER CASE NUMBER D-19-582245-D

DESCRIPTION	HOURS	RATE	AMOUNT
12/11/18 Office Consult with Louis 11:00 a.m. – 12:00 p.m.	1	\$450.00	\$450.00
01/04/19 Review Complaint for Divorce	0.3	\$450.00	\$135.00
01/04/19 Review of Summons	0.2	\$450.00	\$90.00
01/04/19 Review Request for Issuance of Joint Preliminary Injunction	0.2	\$450.00	\$90.00
01/09/19 Review Proof of Service	0.2	\$450.00	\$90.00
01/11/19 Review Joint Preliminary Injunction	0.2	\$450.00	\$90.00
01/29/19 Review Default	0.2	\$450.00	\$90.00
01/31/19 Review Aff. Of Resident Witness	0.2	\$450.00	\$90.00
02/1/19 Review NTC of Seminar Completion	0.2	\$450.00	\$90.00
02/01/19 Review Confidential Information Sheet	0.2	\$450.00	\$90.00
02/04/19 Prepared and Filed Answer and Counter Claim	1	\$450.00	\$450.00
02/07/19 Office Consult with Louis 10:30 a.m. – 11:30 a.m.	1	\$450.00	\$450.00
02/07/19 Prepared and Filed Amended Answer	1.5	\$450.00	\$675.00
02/07/19 Prepared and Filed Motion to Set Aside	2	\$450.00	\$900.00
02/07/19 Review from Court Order Setting Case Management Conf. 16.2	0.5	\$450.00	\$225.00
02/07/19 Prepared and Filed Certificate of Service for Amended MTN	0.2	\$450.00	\$90.00
02/07/19 Prepared and Filed Amended MTN to Set Aside	2	\$450.00	\$900.00
02/21/19 Review Mayo's NTC of Early Case Conference	0.2	\$450.00	\$90.00
02/25/19 Mayo's RPLY to Counter Motion	0.2	\$450.00	\$90.00
02/26/19 Mayo's OPP to Amended MTN and Counter Motion	1	\$450.00	\$450.00
02/26/19 ECC Telephone Conference 11:00 a.m -12:00 p.m.	1	\$450.00	\$450.00
02/26/19 Mayo's Appendix of Exhibits to Pl's OPP. To Amended MTN.	1	\$450.00	\$450.00
02/26/19 Review Adam's Financial Discourse Form	0.3	\$450.00	\$135.00
02/28/19 Court's Notice of Rescheduling of Hearing	0.2	\$450.00	\$90.00
02/28/19 Office Consult with Louis 10:00 a.m. – 11:00 a.m.	1	\$450.00	\$450.00
03/12/19 Notice of Change of Address Adam	0.2	\$450.00	\$90.00
03/15/19 Office Consult with Louis 10:00 a.m. – 11:00 a.m.	1	\$450.00	\$450.00
03/18/19 Prepare and File Rply to Opp. And Counter Motion	1	\$450.00	\$450.00
03/18/19 Appendix of Supp. Exhibits to Pl's OPP. To Amended MTN	1	\$450.00	\$450.00
03/19/19 Hearing CMC Return Hearing FMC- Motion Hearing 9:00 a.m.	2	\$450.00	\$900.00
03/19/19 Review and Calendar Case Trial Management Order	5	\$450.00	\$225.00
03/19/19 Hearing Def's MTN. to Set Aside Prep, Hearing, Travel Time	3	\$450.00	\$1,350.00
03/19/19 Review Behavioral Order	0.3	\$450.00	\$135.00
03/20/19 Review Notice of Association of Counsel	0.2	\$450.00	\$90.00
03/21/19 Office Consult with Louis 1:30 p.m. – 2:30 p.m.	1	\$450.00	\$450.00
03/27/19 Review Letter from Mayo re: Timeshare	0.5	\$450.00	\$225.00
04/04/19 Response Letter to Mayo Re; Timeshare	0.5	\$450.00	\$225.00
4/22/19 Review and Sign Mayo's Stip and Order Modifying Timeshare	0.2	\$450.00	\$90.00

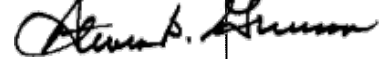


LAW OFFICE OF LOUIS C. SCHNEIDER  
430 S. 7th Street

4/23/19 Review Mayo's NTC of Entry of Order	0.2	\$450.00	\$90.00
05/03/19 Review and Sign Order After Hearing of March 19, 2019	0.5	\$450.00	\$225.00
05/03/19 Review NEOJ Order After Hearing of March 19, 2019	0.5	\$450.00	\$225.00
05/06/19 Office Consult with Louis 10:00 a.m. – 11:00 a.m.	1	\$450.00	\$450.00
05/15/19 Review Mayo's Plaintiff's Expert Witness List	0.5	\$450.00	\$225.00
05/24/19 Review Mayo's Appendix of Supplemental Exhibits in Support of Pl's Emergency Mtn for a Change of Custody; For Attorney's Fees and Costs and Related Relief	0.5	\$450.00	\$225.00
05/28/19 Prepare and File OPP. To Pl's Emergency MTN for a Change of Custody/Spousal Support/Child Support, for Attorney's Fees and Costs and Related Relief, Counter Motion for Change of Custody for Primary Physical Custody and Sole Legal Custody. Psycho Eval of the Plaintiff	2	\$450.00	\$900.00
05/29/19 Review Letter from Mayo RE: Demand for Preservation of Electronically Stored Information	0.5	\$450.00	\$225.00
05/31/19 Preserve Evidence LTR from Mayo	0.5	\$450.00	\$225.00
06/05/19 Review Mayo's Ex Parte Mtn for an Order Shortening Time	0.5	\$450.00	\$225.00
06/11/19 Review Mayo's Reply in Support of Emergency MTN for a Change in Custody; for Attorney's Fees and Costs and Related Relief and OPP. To Counter Motion for Change of Custody for Primary Physical and Sole Legal Custody. Psycho Eval. To Plaintiff	1	\$450.00	\$450.00
06/11/19 Review Mayo's Appendix of Exhibits in Supp. Of Plaintiff's Reply in Support of Emergency MTN. for a Change of Custody, for Attorney's Fees and Costs, and Related Relief and OPP. To Counter Motion for Change of Custody for Primary Physical, and Sole Legal Custody, Psycho Eval. To Plaintiff	0.5	\$450.00	\$225.00
06/12/19 Review Letter from Mayo re: Electronically Stored Information	0.5	\$450.00	\$225.00
06/12/19 Review Notice of Unavailability of Counsel	0.5	\$450.00	\$225.00
06/13/19 Office Consult with Louis 12:30 p.m. – 1:30 p.m.	1	\$450.00	\$450.00
06/14/19 Respond to Mayo's Letter	1	\$450.00	\$450.00
06/14/19 Review and Calendar NTC of Hearing	0.2	\$450.00	\$90.00
06/17/19 Pl's Emergency Mtn Hearing at 10:00 a.m. Prep, Hearing, Travel	3	\$450.00	\$1,350.00
06/27/19 Review Mayo's OPP. To MTN for an Order to Show Cause Re: Hold Plaintiff in Contempt for Failing to Allow Def's Visitation with the Minor Child with Def's Court Hearing Held on March 12, 2019 Violation of Court Orders	0.5	\$450.00	\$225.00
07/09/19 Review Letter from Mayo re: Martial Residence	0.5	\$450.00	\$225.00
07/11/19 Response Letter to Mayo re: Martial Residence dated 7/11/19	1	\$450.00	\$450.00
07/11/19 Response Letter to Mayo re: Martial Residence dated 7/11/19	1	\$450.00	\$450.00
07/15/19 Prepared and Filed Chalese's General Financial Disclosure Form	0.5	\$450.00	\$225.00
07/23/19 Review Court Minutes	0.2	\$450.00	\$90.00
07/23/19 Review NTC of Taking Custodian of Records Depo. And Seven Day NTC of Intent to Serve Subpoena Duces Tecum LVMPD	0.2	\$450.00	\$90.00
07/25/19 Prepare and File Motion for Division if the Proceeds From the Sale of Martial Home; and For Attorney's Fees	1	\$450.00	\$450.00
07/26/19 Review NTC of Entry of July 23, 2019 Minute Order	0.2	\$450.00	\$90.00
07/31/19 Review and Calendar NTC of Hearing	0.2	\$450.00	\$90.00
07/31/19 Letter from Mayo re: house proceeds	0.5	\$450.00	\$225.00
07/31/19 Correction Letter from Mayo re: house proceeds	0.5	\$450.00	\$225.00
08/01/19 Motion For an Order to Show Cause Hearing Prep, Haring Travel	3	\$450.00	\$1,350.00
08/05/19 Review NTC of Taking Custodian of Records Depo and Seven Day NTC of Intent to Serve Subpoena Duces Tecum Cookie Cutters	0.2	\$450.00	\$90.00

430 S. 7th Street

000561



1 LOUIS C. SCHNEIDER  
2 Attorney at Law  
3 Nevada Bar Number 9683  
4 430 South 7<sup>th</sup> Street  
5 Las Vegas, Nevada 89101  
6 T: (702) 435-2121  
7 F: (702) 431-3807  
8 [lcslawllc@yahoo.com](mailto:lcslawllc@yahoo.com)

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

11 ADAM MICHAEL SOLINGER,

Case No.: D-19-582245-D

12 Plaintiff,

Dept. No.: I

13 vs.

14 CHALESE MARIE SOLINGER,

15 Defendant.

16  
17 **NOTICE OF ATTORNEY'S LIEN**

18  
19 **NOTICE IS HEREBY GIVEN** that LOUIS C. SCHNEIDER, ESQ.,  
20 attorney for the Defendant, CHALESE MARIE SOLINGER in the above-entitled  
21 action claims a lien including a retaining lien upon the file and upon any claim  
22 which he might demand or have as to any amounts or property subject of the  
23 above-entitled litigation. Said lien shall attach to the file itself and also to any  
24  
25

26 ///

27 ///

1 verdict, judgment or decree entered and to any money or property which is  
2 recovered on account of the suit or action. Said lien is in the amount of \$15,425.00.  
3

4  
5 Submitted by:

6  
7 DATED this 23<sup>rd</sup> day of August, 2019.

8   
9 LOUIS C. SCHNEDIER, ESQ.

10 State Bar #9683

11 430 S. 7th Street

12 Las Vegas, Nevada 89101

13 (702) 435.2121

14 Attorney for Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Louis C. Schneider, Esq. and that on the 23rd day of August, 2019, I served a true and correct copy of the above and forgoing **NOTICE OF ATTORNEY LIEN** and Related Relief on the parties addressed as shown below:

    X     Via Electronic Service [NEFR Rule 9]

    X     Via U.S. Mail (NRCP 5(b)]- Certified Mail- UPS Tracking Number

Vincent Mayo, Esq.  
THE ABRAMS & MAYO LAW FIRM  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
Ph: 702. 222-4021  
Email: [VMGroup@theabramslawfirm.com](mailto:VMGroup@theabramslawfirm.com)  
UPS Tracking Number 9590 9402 3768 8032 6325 61

Bruce I. Sharipo, Esq.  
PECOS LAW GROUP  
8925 South Pecos Road Suite 14A  
Henderson, Nevada 89074  
Ph: 702.388.1851  
Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)  
UPS Tracking Number 9590 9402 3768 8032 6325 78

Chalese Solinger  
8500 Highland Avenue  
Las Vegas, Nevada 89145  
UPS Tracking Number 9590 9402 3768 8032 6325 85

/s/ Stacie Comerio  
An Employee of Louis C. Schneider, Esq

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Divorce - Complaint**

**COURT MINUTES**

August 28, 2019

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

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**August 28, 2019      7:30 AM      Minute Order**

**HEARD BY:** Moss, Cheryl B.

**COURTROOM:** Courtroom 13

**COURT CLERK:** Erica Jimenez

**PARTIES:**

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

<b>JOURNAL ENTRIES</b>
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**- COURT MINUTE ORDER**

On July 25, 2019 Defendant/Mother filed a Motion for Division of the Proceeds from the Sale of the Marital Home and for Attorney's Fees which was set for September 3, 2019 at 9:00am.

Plaintiff/Father has not filed an Opposition to Defendant/Mother's Motion.

THE COURT FINDS that the hearings currently set for September 3, 2019 at 9:00am is moot as the matter was already heard and addressed at the August 1, 2019 hearing.

IT IS HEREBY ORDER that Defendant/Mother's Motion currently set for September 3, 2019 at 9:00am should be VACATED.

PRINT DATE:	08/28/2019	Page 1 of 3	Minutes Date:	August 28, 2019
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**Notice:** Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

IT IS FURTHER ORDERED that the Evidentiary Hearing is set for October 9, 2019 at 9:00 a.m. and October 10, 2019 at 9:00 a.m.

SO ORDERED.

A copy of the Minute Order shall be served on Counsel.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

*Canceled: September 03, 2019 9:00 AM Motion*

*Canceled: September 03, 2019 9:00 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: September 09, 2019 9:00 AM Calendar Call*

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

*Moss, Cheryl B.*

*Courtroom 13*

*Jimenez, Erica*

October 09, 2019 9:00 AM Evidentiary Hearing

Moss, Cheryl B.

Courtroom 13

Jimenez, Erica

October 09, 2019 2:30 AM Motion

Moss, Cheryl B

Courtroom 13

Jimenez, Erica

October 10, 2019 9:00 AM Evidentiary Hearing

Moss, Cheryl B.

Courtroom 13

Jimenez, Erica

PRINT DATE:	08/28/2019	Page 2 of 3	Minutes Date:	August 28, 2019
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**Notice:** Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

D-19-582245-D

PRINT DATE:	08/28/2019	Page 3 of 3	Minutes Date:	August 28, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

000567



*Steven D. Grierson*

1 **SUB**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **PECOS LAW GROUP**

5 8925 South Pecos Road, Suite 14A

6 Henderson, Nevada 89074

7 Telephone: (702) 388-1851

8 Facsimile: (702) 388-7406

9 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

10 Attorney for Defendant

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

14 **Adam Michael Solinger,**

15 Plaintiff,

16 vs.

17 **Chalese Marie Solinger,**

18 Defendant.


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

Dept No. **I**

19 **SUBSTITUTION OF ATTORNEYS**

20 Defendant, **Chalese Marie Solinger**, hereby substitutes **Bruce I. Shapiro,**  
21 **Esq.**, of **PECOS LAW GROUP**, as her attorney in the above-entitled action in the  
22 place and stead of **Louis Schneider, Esq.**

23 DATED this 21 day of August, 2019.

24   
25 **Chalese Marie Solinger**

Bruce I. Shapiro, Esq. of PECOS LAW GROUP, does hereby agree to be substituted in the place and stead of **Louis Schneider, Esq.**, as attorney of record for Defendant, **Chalese Marie Solinger**, in the above-entitled action.

DATED this 28 day of August, 2019.

~~PECOS LAW GROUP~~

**Bruce I. Shapiro, Esq.**  
Nevada Bar No. 004050  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
(702) 388-1851

Louis Schneider, Esq., does hereby agree to the substitution of **Bruce I. Shapiro, Esq.** of PECOS LAW GROUP, as attorney of record in the above-entitled action for Defendant, **Chalese Marie Solinger.**

DATED this \_\_\_\_\_ day of August, 2019.

LAW OFFICES OF LOUIS C. SCHNEIDER

**Louis Schneider, Esq.**  
Nevada Bar No. 009683  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
(702) 435-2121


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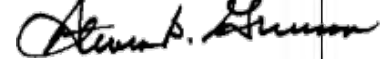
**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I hereby certify that the foregoing "*Substitution of Attorneys*" in the above-captioned case was served this date by e-service, pursuant to Rule 9 of N.E.F.C.R., E.D.C.R. 7.26(a)(4), and E.J.D.C. AO 9-12 and AO 14-2, to the following email(s), which is/are the email(s) registered with the electronic filing system:

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
Adam M. Solinger	adam@702defense.com
admin email	email@pecoslawgroup.com
Amy Robinson	amy@pecoslawgroup.com
Louis Schneider	lcsllawllc@gmail.com
Louis Schneider	lcsllawllc@gmail.com
Louis Schneider	lcsllawllc@yahoo.com
Bruce Shapiro	bruce@pecoslawgroup.com

DATED this 28<sup>th</sup> day of August 2019.

  
\_\_\_\_\_  
Angela Romero  
an employee of PECOS LAW GROUP



1 **MOT**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

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

14 **Adam Michael Solinger,**

15 Plaintiff,

16 vs.

17 **Chalese Marie Solinger,**

18 Defendant.

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

Dept No. **I**

19 **DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL**  
20 **MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY**  
21 **DEADLINES (FIRST REQUEST)**

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

25 1. An Order continuing the trial set for October 9 and 10, 2019 to the  
26 court's first available date after 60 days;

2. The issuance of a new Trial Management Order that establishes new

1 discovery and pre-trial deadlines; and

2 3. For other and further relief as the Court deems proper.

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

7 DATED this 28 day of August, 2019.

8 PECOS LAW GROUP

9  
10   
11 **Bruce I. Shapiro, Esq.**

12 Nevada Bar No. 004050

**Jack W. Fleeman, Esq.**

13 Nevada Bar No. 010584

14 PECOS LAW GROUP

15 8925 South Pecos Road, Suite 14A

16 Henderson, Nevada 89074

17 Attorneys for Defendant  
18  
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1                   **INITIAL STATEMENT OF ATTEMPTED RESOLUTION**  
2                   **PURSUANT TO EDCR 5.501**

3           Pecos Law Group was retained by Defendant Chalese Solinger on August  
4 21, 2019. Immediately upon retention, Pecos Law Group sent correspondence to  
5 Adam's counsel, Vincent Mayo requesting a continuance. *See* correspondence in  
6 Defendant's Exhibit Addendum Exhibit "A" at DEF00001 – DEF00002. Mr.  
7 Mayo responded with correspondence dated August 22, 2019, clearly opposing  
8 trial being continued. See letter in Defendant's Exhibit Addendum Exhibit "B" at  
9 DEF00003.

10                   **POINTS AND AUTHORITIES**

11                   **I. FACTS**

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

16           The contested issues in this case are custody, support, property, debts,  
17 alimony, and attorney's fees. On March 19, 2019, the court entered a "Case and  
18 Non-Jury Trial Management Order" that set a Calendar Call for September 9,  
19 2019 and trial on October 9, 2019 and October 10, 2019. This order also provided  
20 that discovery closed on September 9, 2019.

21           At the time the Trial Management Order was issued, Chalese was  
22 represented by Mr. Lou Schneider. Consequently, Chalese reasonably expected  
23

1 that Mr. Schneider would pursue her case and conduct discovery so that the case  
2 could either be settled or proceed to trial. Unfortunately, in August 2019, while  
3 communications between Chalese and Mr. Schneider continued to break down,  
4 Chalese began to believe that Mr. Schneider had failed to make any preparations  
5 for trial in this case. Chalese formed this belief after consulting with current  
6 counsel who explained what discovery was to her. When asked about discovery,  
7 Chalese informed current counsel that she was unaware of whether any discovery  
8 had been conducted because she had never received anything from Mr. Schneider.  
9 She also noted that she was unaware if any documents had been disclosed from  
10 her side, as required by rule.

12 Worried about her case, Chalese retained Pecos Law Group on August 21,  
13 2019. Pecos Law Group then immediately sent a letter and a proposed  
14 substitution of attorney, signed by Chalese, to Mr. Schneider. *See* correspondence  
15 in Defendant's Exhibit Addendum Exhibit "C" at DEF00004 – DEF00007. In  
16 that letter, Mr. Shapiro asked that Mr. Schneider contact him and let him know  
17 when he could arrange to pick up the Substitution of Attorney and Chalese's file.<sup>1</sup>  
18 Mr. Schneider never responded to this letter, but instead, on August 23, 2019, filed  
19 a Motion to Withdraw and Adjudicate Attorney's Lien.<sup>2</sup>

---

21 <sup>1</sup> The letter also noted that Chalese had never received any billing statements from Mr.  
22 Schneider.

23 <sup>2</sup> On August 27, 2019, the day before this motion is being filed, Pecos Law Group  
24 received an email from Mr. Schneider's office that included the signed Substitution of Attorney.  
25 The email did not address the request for the file (which Pecos Law Group still does not have),  
nor did it address the lack of prior billing statements. In the email, Mr. Schneider's office

1 Chalese's worry that Mr. Schneider made no attempts to conduct discovery  
2 in her case was shown to be valid when Chalese received a copy of Mr.  
3 Schneider's motion to withdraw. Mr. Schneider attached his billing statement,  
4 which Chalese had never received previously. *See* Exhibit "2," to Mr. Schneider's  
5 Motion to Withdraw. In that billing statement there are no entries related to  
6 discovery.<sup>3</sup>

7  
8 Based on the billing statements, even though Mr. Schneider has never  
9 turned over Chalese's file, that Mr. Schneider failed to conduct any discovery or  
10 to adequately prepare Chalese's case for either settlement discussions or trial.  
11 This failure to pursue Chalese's case has been unfairly prejudicial to Chalese and  
12 presents good cause to continue the trial and issue a new Trial Management Order  
13 in this case.

14 On August 21, 2019, based on this good cause, which was believed to exist  
15 even prior to the disclosure of Mr. Schneider's billing statement, Mr. Shapiro sent  
16 a letter to Mr. Mayo asking for a stipulation to continue the trial. Mr. Mayo  
17

18  
19 claims that the substitution was faxed to Pecos Law Group on August 23, 2019. However,  
20 Pecos Law Group never received a fax copy, there is no confirmation sheet from Mr. Schneider  
21 showing that it was ever faxed, and Mr. Schneider's signature does not have a date above it.  
Moreover, if Mr. Schneider had signed the substitution on August 23, 2019, as his office claims,  
there would have been no need for Mr. Schneider to file his motion to withdraw from the case  
that same afternoon.

22 <sup>3</sup> While it is not before the court currently, it will be noted in opposition to Mr.  
23 Schneider's request to adjudicate the lien, that Mr. Schneider's billing is completely  
24 unreasonable. As just a couple of examples, Mr. Schneider billed Chalese 0.8 hours of attorney  
time (\$360) to review the boilerplate request for JPI, JPI, summons and proof of service. He  
also billed 0.5 hours (\$225) just to review Notices of Entry of Orders. He made the same half-  
hour (\$225) charge to review Mr. Mayo's Notice of Unavailability.



1 responded on August 22, 2019 refusing to continue the trial. See Exhibit “B.” In  
2 his letter, Mr. Mayo stated that discovery was almost complete, and that Mr.  
3 Shapiro could not legitimately substitute into the case if a delay of the trial would  
4 result. *See* EDCR 7.40.

5 Mr. Mayo was wrong on both counts. First, discovery was never  
6 conducted, so it could not be “almost complete.” Second, the need to continue the  
7 trial is not due to Mr. Shapiro’s substitution, but rather the need for Chalese to  
8 adequately prepare for trial after Mr. Schneider failed to do so. Chalese should be  
9 afforded her day in court with adequate counsel, and the court should want to  
10 make a decision in this case based on evidence that has been obtained through an  
11 adequate and proper discovery process.

12 Finally, and extremely important, is that *Adam, through his employer is*  
13 *relying on Mr. Schneider’s refusal to sign the Substitution of Attorney in a*  
14 *timely manner as a means to avoid discovery.* See objection to subpoena in  
15 Defendant’s Exhibit Addendum Exhibit “D” at DEF00008.<sup>4</sup> Mr. Shapiro sent a  
16 subpoena to Adam’s employer in order to obtain legitimate and discoverable  
17 information in this case. Adam’s employer is refusing to produce the requested  
18 information to Pecos Law Group because Mr. Shapiro, because of Mr. Schneider’s  
19 inaction, was not the attorney of record at the time the subpoena was issued. In  
20 other words, *Mr. Schneider’s delay has made it impossible for Pecos Law Group*  
21

22  
23  
24 <sup>4</sup> While there is no date on this letter, it was received August 28, 2019 and postmarked  
25 August 26, 2019.

1 *to serve a proper subpoena before the discovery deadline. This fact perfectly*  
2 *illustrates why a continuance and a new Trial Management Order are*  
3 *warranted in this case.*

## 4 **II. LEGAL ARGUMENT**

### 5 **A. THE COURT SHOULD CONTINUE TRIAL AND ISSUE A NEW** 6 **TRIAL MANAGEMENT ORDER.**

7 EDCR 7.30(a) states:

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

13 Good cause exists to continue the trial in this matter because Chalese's prior  
14 counsel, who failed to properly communicate with her or to provide her with  
15 information on her case, also failed to conduct any discovery. Prior counsel's  
16 failure has made it impossible for Chalese to proceed to trial as planned because  
17 Chalese has been unable to gather the evidence necessary to present her case. The  
18 evidence Chalese is seeking is essential in this case because in addition to property  
19 and alimony issues, this case is about child custody, and the court should consider  
20 all evidence that relates to the children's best interests. *See* NRS 125C.0035.  
21  
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1 In addition to EDCR 7.30(a), subsection (h) states that motions to continue  
2 trial that also seek an extension of discovery dates must also comply with EDCR  
3 2.35, which states:

4  
5 (a) Stipulations or motions to extend any date set by the discovery  
6 scheduling order must be in writing and supported by a showing of  
7 good cause for the extension and be received by the discovery  
8 commissioner within 20 days before the discovery cut-off date or any  
9 extension thereof. A request made beyond the period specified above  
10 shall not be granted unless the moving party, attorney or other person  
11 demonstrates that the failure to act was the result of excusable neglect.

12 (1) All stipulations to extend any discovery scheduling order  
13 deadline shall be lodged with the discovery commissioner and shall  
14 include on the last page thereof the words "IT IS SO ORDERED"  
15 with a date and signature block for the commissioner or judge's  
16 signature.

17 (2) A motion to extend any discovery scheduling order  
18 deadline shall be set in accordance with Rule 2.34(c).

19 (b) Every motion or stipulation to extend or reopen discovery  
20 shall include:

21 (1) A statement specifying the discovery completed;

22 (2) A specific description of the discovery that remains to be  
23 completed;

24 (3) The reasons why the discovery remaining was not  
25 completed within the time limits set by the discovery order;

26 (4) A proposed schedule for completing all remaining  
discovery;

(5) The current trial date; and

(6) Immediately below the title of such motion or stipulation  
a statement indicating whether it is the first, second, third, etc.,  
requested extension, e.g.:

STIPULATION FOR EXTENSION OF TIME TO COMPLETE  
DISCOVERY (FIRST REQUEST)

(c) The court may set aside any extension obtained in  
contravention of this rule.

1 Here, Chalese is not asking for a specific extension of deadlines, but rather  
2 a new Trial Management Order that sets new deadlines. Chalese's prior counsel  
3 conducted no discovery and the current discovery deadline is only a little over a  
4 week away. As such, Chalese respectfully requests that the court issue a new  
5 Trial Management Order that permits her to conduct discovery for the first time  
6 in this case.  
7

8  
9 Alternatively, if the court should determine that the request for a new Trial  
10 Management Order is equivalent to a request to extend discovery dates, Chalese  
11 respectfully requests that the court waive, in the interest of proper and efficient  
12 administration of justice, the need for Chalese to present the motion to continue  
13 to this court, while presenting the motion to extend deadlines to the discovery  
14 commissioner. *See* NRCP 1; *see also* EDCR 1.10 (stating the rules "must be  
15 liberally construed to secure the proper and efficient administration of the  
16 business and affairs of the court and to promote and facilitate the administration  
17 of justice.")  
18

### 19 20 **III. CONCLUSION**

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

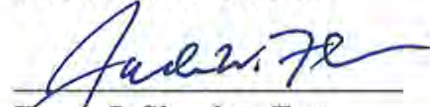
- 23 1. An Order continuing the trial set for October 9 and 10, 2019 to the  
24 court's first available date after 60 days;

1           2.     The issuance of a new Trial Management Order that establishes new  
2 discovery and pre-trial deadlines; and

3           3.     For other and further relief as the Court deems proper.

4           DATED this 28 day of August, 2019.

6                           PECOS LAW GROUP

7                           

8                           **Bruce I. Shapiro, Esq.**  
9                           Nevada Bar No. 004050

10                          **Jack W. Fleeman, Esq.**  
11                          Nevada Bar No. 010584

12                          PECOS LAW GROUP

13                          8925 South Pecos Road, Suite 14A

14                          Henderson, Nevada 89074

15                          Attorneys for Defendant

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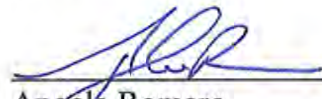
22   
23 Bruce I. Shapiro, Esq. 8/28/19  
**Dated**

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that the foregoing  
3 “DEFENDANT’S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF  
4 NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND  
5 DISCOVERY DEADLINES (FIRST REQUEST)” in the above-captioned case was  
6 served this date by e-service, pursuant to Rule 9 of N.E.F.C.R., E.D.C.R.  
7 7.26(a)(4), and E.J.D.C. AO 9-12 and AO 14-2, to the following email(s), which  
8 is/are the email(s) registered with the electronic filing system:  
9

10 Vincent Mayo	VMGroup@TheAbramsLawFirm.com
11 admin email	email@pecoslawgroup.com
12 Jack Fleeman	jack@pecoslawgroup.com
13 Amy Robinson	amy@pecoslawgroup.com
14 Bruce Shapiro	bruce@pecoslawgroup.com

15  
16 DATED this 28<sup>th</sup> day of August, 2019.

17   
18 \_\_\_\_\_  
19 Angela Romero,  
20 An Employee of PECOS LAW GROUP  
21  
22  
23  
24



MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam M. Solinger,  
Plaintiff/Petitioner

Chalese M. Solinger,  
Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

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

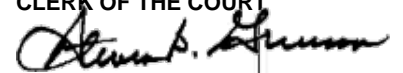
The total filing fee for the motion/opposition I am filing with this form is:

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

Party filing Motion/Opposition: Defendant Date 8/29/19

Signature of Party or Preparer 





1 **EXHS**  
2 **Bruce I. Shapiro, Esq.**  
Nevada Bar No. 004050  
3 **Jack W. Fleeman, Esq.**  
Nevada Bar No. 010584  
4 PECOS LAW GROUP  
5 8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
6 Telephone: (702) 388-1851  
7 Facsimile: (702) 388-7406  
8 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

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

12 **Adam Michael Solinger,**  
13  
14 **Plaintiff,**

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

15 vs.

16 **Chalese Marie Solinger,**  
17  
18 **Defendant.**

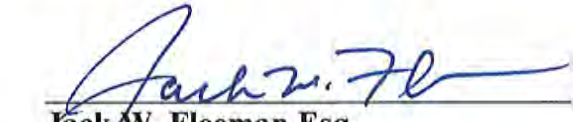
19  
20 **EXHIBITS TO**  
21 **DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF**  
22 **NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO**  
23 **EXTEND DISCOVERY DEADLINES (FIRST REQUEST)**

24 EXHIBIT A:	Correspondence to Vincent Mayo, Esq. dated August 21, 2019.	DEF00001 – DEF00002
25 EXHIBIT B:	Correspondence from Vincent Mayo, Esq. dated August 22, 2019.	DEF00003
26 EXHIBIT C:	Correspondence to Louis Schneider, Esq. dated August 21, 2019.	DEF00004 – DEF00007

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EXHIBIT D:	Objection to Subpoena from Michael V. Castillo, Esq.	DEF00008
------------	------------------------------------------------------	----------

**DATED** this 28 day of August, 2019.

  
**Jack W. Fleeman Esq.**  
Nevada Bar No. 010584  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Attorneys for Plaintiffs

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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 28<sup>th</sup> day of August, 2019, I served a copy of **EXHIBITS TO DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST)** as follows:

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

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

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

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

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
admin email	email@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Amy Robinson	amy@pecoslawgroup.com
Bruce Shapiro	bruce@pecoslawgroup.com

  
\_\_\_\_\_  
ANGELA ROMERO  
An employee of PECOS LAW GROUP

# **EXHIBIT A**

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

\*Also Licensed in California

Kirby Wells  
Of Counsel

## PECOS LAW GROUP

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

**Legal Assistants**

Amy Robinson, C.D.F.A.  
Allan Brown, M.B.A.  
Amalia Alvarez Sciscenio  
Angela Romero  
Heather Witte  
Susan Peroutka  
Shirley Martinez  
Stephanie Pitts

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

August 21, 2019

Via Fax: 702.248.9750

Via Email: VMayo@TheAbramsLawFirm.com

**Vincent Mayo, Esq.**

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

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

Dear Vince:

I am substituting in for Lou Schneider on the above-referenced case. It appears that the calendar call set for September 9, 2019, has been vacated, but there may be a pending hearing for September 3, 2019. I would appreciate you confirming any pending hearing dates.

My understanding is that trial has been scheduled for October 9<sup>th</sup> and 10<sup>th</sup>. For multiple reasons, I am asking that you stipulate to continue the trial. Please advise immediately if you are willing to enter into this stipulation, or a motion will be filed.

Sincerely,

/Bruce I. Shapiro/

BRUCE I. SHAPIRO, ESQ.

BIS/ar

cc: Chalese Marie Solinger

DEF00001

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# Send Result Report



MFP

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## Complete

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**Abrams**  
Bruce J. Shapiro  
Vincent Mayo  
Charles R. Mayberry  
Jesse W. Harkins  
Dustin R. Baumgardner  
Jonathan Payton V. H.  
Caleb L. Shumway  
Rico S. Deloy  
Via Courier to Submits  
Rico S. Deloy  
C/O. 6252

### PECOS LAW GROUP

A Professional Law Corporation  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
Telephone (702) 388-1811  
Fax (702) 388-1816  
Email: Email@PecosLawGroup.com

**Lead Attorneys**  
Jeff Rosenberg, C.D. P.A.  
Allen Brown, M.D.  
James A. Brown, Esq.  
Angela Brown  
Matthew Hise  
Jesse Payton V. H.  
Caleb L. Shumway  
Rico S. Deloy  
Via Courier to Submits  
Rico S. Deloy  
C/O. 6252

August 21, 2019

Via Fax: 702.748.9750

Via Email: VMayo@TheAbramsLawFirm.com

Vincent Mayo, Esq.

THE ABRAMS & MAYO LAW FIRM

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Re: *Sollinger vs. Sollinger* (D-19-382243-D)

Dear Vince:

I am substituting in for Lou Schneider on the above-referenced case. It appears that the calendar call set for September 9, 2019, has been vacated, but there may be a pending hearing for September 3, 2019. I would appreciate you confirming any pending hearing dates.

My understanding is that trial has been scheduled for October 9<sup>th</sup> and 10<sup>th</sup>. For multiple reasons, I am asking that you stipulate to continue the trial. Please advise immediately if you are willing to enter into this stipulation, or a motion will be filed.

Sincerely,

/Bruce J. Shapiro/

BRUCE J. SHAPIRO, ESQ.

BJS/ar

cc: Chalese Marie Sollinger

No.	Date/Time	Destination	Times	Type	Result	Resolution/ECH
001	08/21/19 11:09	7022489750	0°00'27"	FAX	OK	200x100 Normal/0n

# **EXHIBIT B**



†† Jennifer V. Abrams, Esq.  
† Vincent Mayo, Esq.  
6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
P. 702.222.4021 F. 702.248.9750  
www.TheAbramsLawFirm.com

Thursday, August 22, 2019

Bruce I. Shapiro, Esq.  
8925 South Pecos Rd., Suite 14 A  
Henderson, Nevada 89074

Re: Adam M. Solinger v. Chalese M. Solinger  
Case Number: D-19-582245-D

**Urgent Attention is Requested**

Dear Mr. Shapiro:

I am in receipt of your letter of yesterday's date. As to the September 3<sup>rd</sup> hearing, it is still set for that day.

In regard to your request to continue trial, we are strongly opposed to any continuance. Both sides stipulated that at least two full days trial were required due to the number of issues and evidence to be presented. When we requested those two full days, it was in March of this year. At that time, the Court's first available two days of trial were October 2019 – 7 months. Seeking a continuance for two full days of trial would mean trial would not be until April or May of 2020. This is fundamentally unfair and prejudicial to my client as discovery is almost complete and there are pressing issues that need to be resolved as soon as possible, the most important one of all being child custody.

Further, EDCR 7.40(c) states that, "(c) No application for withdrawal or substitution may be granted if a delay of the trial or of the hearing of any other matter in the case would result." That is what you are proposing in attempting to substitute into this matter. I therefore strongly discourage you from substituting into this matter unless and if you are capable of doing so and getting up to speed in order to be ready for trial. If you do, I will be forced to argue you did so knowing you could diligently take on the matter and be prepared for trial in October. This would be in line with your obligation under NRPC 3.2 to expedite litigation in your client's interest and not action contrary to it.

Sincerely,

THE ABRAMS & MAYO LAW FIRM

/s/ Vincent Mayo

Vincent Mayo, Esq.

CC: Mr. Adam Solinger

---

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

DEF00003

000591



# EXHIBIT C

Attorneys

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

\*Also Licensed in California

Kirby Wells  
Of Counsel

## PECOS LAW GROUP

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

Legal Assistants

Amy Robinson, C.D.F.A.  
Allan Brown, M.B.A.  
Amalie Alvarez Scisceno  
Angela Romero  
Heather Witte  
Susan Peroutka  
Shirley Martinez  
Stephanie Pitts

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

August 21, 2019

**Louis Schneider, Esq.**  
LAW OFFICES OF LOUIS C. SCHNEIDER, LLC  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101

Via Facsimile Transmission  
(702) 431-3807

Re: ***Solinger vs. Solinger***, Case No. D-19-582245-D

Dear Mr. Schneider:

Enclosed is a "*Substitution of Attorneys*" that Chalese Solinger has signed to substitute my office in the above-referenced matter. Please contact my office when the original "*Substitution of Attorneys*" has been signed and when we may pick up Ms. Solinger's file from your office.

Additionally, Ms. Solinger has advised that she has not received any billing statements from your office and has requested that you forward this office a copy of all of her billing statements.

Your prompt attention is appreciated.

Sincerely,

/Bruce I. Shapiro/

BRUCE I. SHAPIRO, ESQ.

BIS/ar  
Enclosure

cc: Chalese Solinger

000593

1 SUB

2 Bruce I. Shapiro, Esq.

3 Nevada Bar No. 004050

4 PECOS LAW GROUP

5 8925 South Pecos Road, Suite 14A

6 Henderson, Nevada 89074

7 Telephone: (702) 388-1851

8 Facsimile: (702) 388-7406

9 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

10 Attorney for Defendant

11 DISTRICT COURT  
12 FAMILY DIVISION  
13 CLARK COUNTY, NEVADA

14 Adam Michael Solinger,

15 Plaintiff,

16 vs.

17 Chalese Marie Solinger,

18 Defendant.

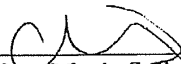
Case No. D-19-582245-D

Dept No. I

19 SUBSTITUTION OF ATTORNEYS

20 Defendant, Chalese Marie Solinger, hereby substitutes Bruce I. Shapiro,  
21 Esq., of PECOS LAW GROUP, as her attorney in the above-entitled action in the  
22 place and stead of Louis Schneider, Esq.

23 DATED this 21 day of August, 2019.

24   
25 Chalese Marie Solinger  
26

**Bruce I. Shapiro, Esq.** of PECOS LAW GROUP, does hereby agree to be substituted in the place and stead of **Louis Schneider, Esq.**, as attorney of record for Defendant, **Chalese Marie Solinger**, in the above-entitled action.

DATED this \_\_\_\_\_ day of August, 2019.

PECOS LAW GROUP

**Bruce I. Shapiro, Esq.**  
Nevada Bar No. 004050  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074  
(702) 388-1851

**Louis Schneider, Esq.**, does hereby agree to the substitution of **Bruce I. Shapiro, Esq.** of PECOS LAW GROUP, as attorney of record in the above-entitled action for Defendant, **Chalese Marie Solinger**.

DATED this \_\_\_\_\_ day of August, 2019.

LAW OFFICES OF LOUIS C. SCHNEIDER

**Louis Schneider, Esq.**  
Nevada Bar No. 009683  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
(702) 435-2121

# Send Result Report



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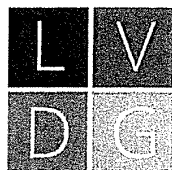
## Complete

Document: doc20190821110733

<small><b>SOLINGER</b> Bruce I. Solinger Paul A. Schaefer Doreen D. Wenzel Josh M. Flinn Dustin E. Riedel Jennifer Pappas Cory L. Dwyer Micki E. Dwyer "As Licensed" - CHS/MS http://www.bisgroup.com</small>	<b>PECOS LAW GROUP</b> <small>A Professional Law Corporation</small> 8925 South Pecos Road, Suite 14A Henderson, Nevada 89114 Telephone (702) 388-1851 Facsimile (702) 388-7406 Email: Email@PecosLawGroup.com	<small><b>Louis Schneider</b> Amy Robinson, Esq. Adam Brown, Esq. Ariel A. Brown, Esq. Rachel Brown Suzanne Williams Susan K. Smith Shirley M. Smith Shirley M. Smith</small>
August 21, 2019		
<div style="display: flex; justify-content: space-between;"><div><b>Louis Schneider, Esq.</b> LAW OFFICES OF LOUIS C. SCHNEIDER, LLC 130 South 7th Street Las Vegas, Nevada 89101</div><div style="text-align: right;"><u>Via Facsimile Transmission</u> (702) 411-3807</div></div>		
Re: <i>Solinger vs. Solinger</i> , Case No. D-19-582245-D		
Dear Mr. Schneider:		
Enclosed is a "Substitution of Attorneys" that Chaleso Solinger has signed to substitute my office in the above-referenced matter. Please contact my office when the original "Substitution of Attorneys" has been signed and when we may pick up Ms. Solinger's file from your office.		
Additionally, Ms. Solinger has advised that she has not received any billing statements from your office and has requested that you forward this office a copy of all of her billing statements.		
Your prompt attention is appreciated.		
Sincerely,  /Bruce I. Shapiro  BRUCE I. SHAPIRO, ESQ.		
DIS/ur Enclosure		
cc: Chaleso Solinger		

No.	Date/Time	Destination	Times	Type	Result	Resolution/ECH
001	08/21/19 11:08	7024313807	0'01'09"	FAX	OK	200x100 Normal/Off

# **EXHIBIT D**



LAS VEGAS  
**DEFENSE GROUP**

L.L.C.

Michael L. Becker, Esq.†  
Michael V. Castillo, Esq.  
Adam M. Solinger, Esq.  
Baylie A. Hellman, Esq.

Neil Shouse, Esq.\*  
Daria Panoff, Esq.  
Charles Goodwin, Esq.

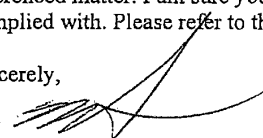
Bruce Shapiro  
8925 South Pecos Road, Suite 14A  
Henderson, Nevada 89074

RE: Improperly Issued Subpoenas in D-19-582245-D

Mr. Shapiro:

It appears there is some confusion on your part. You are not the attorney of record on the above referenced matter. I am sure you are well aware that the unlawful subpoenas you sent will not be complied with. Please refer to the Nevada Rules of Civil Procedure for further guidance.

Sincerely,



Michael V. Castillo, Esq.

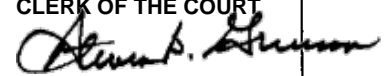
2970 W. SAHARA AVENUE, LAS VEGAS, NEVADA 89102  
TEL: 702.333.3673, FAX: 702.974.0524

[www.702DEFENSE.com](http://www.702DEFENSE.com)

\*Licensed to practice in Nevada and California  
†Licensed to practice in Nevada, California and Colorado

DEF00008

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1 NEO

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5 **DISTRICT COURT**  
6 **CLARK COUNTY, NEVADA**

7 \* \* \*

8  
9 Adam Michael Solinger, Plaintiff  
10 vs.  
11 Chalese Marie Solinger,  
12 Defendant.

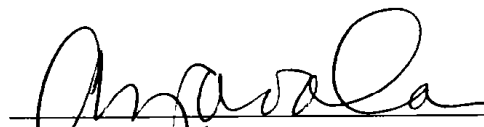
Case No: D-19-582245-D  
Department I

13  
14 **NOTICE OF ENTRY OF AUGUST 28, 2019 MINUTE ORDER**

15 TO ALL INTERESTED PARTIES:

16 **PLEASE TAKE NOTICE** that a Minute Order was entered in the above-  
17 entitled matter on the August 28, 2019 a true and correct copy of which is attached  
18 hereto.  
19

20  
21 Dated: August 28, 2019


22  
23   
24 Suzanna Zavala,  
25 Judicial Executive Assistant to the  
26 Honorable Cheryl B. Moss  
27  
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☒ I ESERVED placed a copy of the foregoing NOTICE OF ENTRY OF AUGUST 28, 2019 MINUTE ORDER to the appropriate attorneys to:

**LOUIS C. SCHNEIDER, ESQ.**  
430 South 7<sup>th</sup> Street  
Las Vegas, Nevada 89101  
[lclawllc@yahoo.com](mailto:lclawllc@yahoo.com)  
Attorney for Defendant

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

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Divorce - Complaint

## COURT MINUTES

August 28, 2019

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

**August 28, 2019      7:30 AM      Minute Order**

**HEARD BY:** Moss, Cheryl B.

**COURTROOM:** Courtroom 13

**COURT CLERK:** Erica Jimenez

**PARTIES:**

Adam Solinger, Plaintiff, Counter Defendant, Vincent Mayo, Attorney, not present  
not present

Chalese Solinger, Defendant, Counter Claimant, not present	Louis Schneider, Attorney, not present
Marie Solinger, Subject Minor, not present	
Michael Solinger, Subject Minor, not present	

## JOURNAL ENTRIES

- COURT MINUTE ORDER

On July 25, 2019 Defendant/Mother filed a Motion for Division of the Proceeds from the Sale of the Marital Home and for Attorney's Fees which was set for September 3, 2019 at 9:00am.

Plaintiff/Father has not filed an Opposition to Defendant/Mother's Motion.

THE COURT FINDS that the hearings currently set for September 3, 2019 at 9:00am is moot as the matter was already heard and addressed at the August 1, 2019 hearing.

IT IS HEREBY ORDER that Defendant/Mother's Motion currently set for September 3, 2019 at 9:00am should be VACATED.

PRINT DATE:	08/28/2019	Page 1 of 3	Minutes Date:	August 28, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

D-19-582245-D

IT IS FURTHER ORDERED that the Evidentiary Hearing is set for October 9, 2019 at 9:00 a.m. and October 10, 2019 at 9:00 a.m.

SO ORDERED.

A copy of the Minute Order shall be served on Counsel.

**INTERIM CONDITIONS:**

**FUTURE HEARINGS:**

*Canceled: September 03, 2019 9:00 AM Motion*

*Canceled: September 03, 2019 9:00 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: September 09, 2019 9:00 AM Calendar Call*

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

*Moss, Cheryl B.*

*Courtroom 13*

*Jimenez, Erica*

October 09, 2019 9:00 AM Evidentiary Hearing

Moss, Cheryl B.

Courtroom 13

Jimenez, Erica

October 09, 2019 2:30 AM Motion

Moss, Cheryl B

Courtroom 13

Jimenez, Erica

October 10, 2019 9:00 AM Evidentiary Hearing

Moss, Cheryl B.

Courtroom 13

Jimenez, Erica

PRINT DATE:	08/28/2019	Page 2 of 3	Minutes Date:	August 28, 2019
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**Notice:** Journal entries are prepared by the courtroom clerk and are not the official record of the Court.

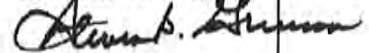
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D-19-582245-D

PRINT DATE:	08/28/2019	Page 3 of 3	Minutes Date:	August 28, 2019
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**Notice: Journal entries are prepared by the courtroom clerk and are not the official record of the Court.**

000603



1 **EXMT**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

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

Dept No. **I**

21 **EX PARTE MOTION FOR ORDER SHORTENING TIME**  
22 **TO HEAR DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF**  
23 **NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND**  
24 **DISCOVERY DEADLINES (FIRST REQUEST)**


25 COME NOW Defendant, **Chalese Solinger** (hereinafter "**Chalese**"), by and  
26 through her attorneys of record, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman,**  
27 **Esq.**, of PECOS LAW GROUP, and pursuant to EDCR 5.513, hereby requests an Order  
28

1 Shortening Time for this Court to hear her Motion to Continue Trial, and for  
2 Issuance of New Trial Management Order, or in the Alternative to Extend  
3  
4 Discovery Deadlines (First Request).

5 This Ex Parte Motion is based upon the pleadings and papers on file herein,  
6  
7 the affidavit of counsel attached hereto, and is compliant with EDCR 5.513.

8 DATED this 29 day of August, 2019.

9  
10 PECOS LAW GROUP

11  
12   
13 **Bruce I. Shapiro, Esq.**  
14 Nevada Bar No. 4050  
15 **Jack W. Fleeman, Esq.**  
16 Nevada Bar No. 10584  
17 8925 S. Pecos Road, Suite 14A  
18 Henderson, NV 89074  
19 *Attorneys for Defendant*  
20  
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STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

1. That I am an attorney licensed to practice in the State of Nevada and I am counsel for the Defendant, Chalese Solinger, in the above-referenced action; that by virtue of that fact, I have personal knowledge of the matters contained herein and I am competent to testify to the same.

3. On March 19, 2019, the court entered a “Case and Non-Jury Trial Management Order” that set a Calendar Call for September 9, 2019 and trial on October 9, 2019 and October 10, 2019. This order also provided that discovery closes on September 9, 2019.

5. Chalese reasonably expected that Mr. Schneider would pursue her case and conduct discovery so that the case could either be settled or proceed to trial. However, in August 2019, communications between Chalese and Mr. Schneider



1 continued to break down, and Chalese began to believe that Mr. Schneider had failed  
2 to make any preparations for trial in this case.  
3

4 6. Chalese did not know exactly what discovery was, and upon learning  
5 about the process from current counsel, she was unaware if any discovery had been  
6 conducted. Chalese never received any communications from Mr. Schneider  
7 regarding discovery or preparations for trial, nor had she received any billing  
8 statements outlining Mr. Schneider's work on her case.  
9  
10

11 7. Chalese's uncertainties about the current status of her case lead her to  
12 retain Pecos Law Group on August 21, 2019.  
13

14 8. Pecos Law Group sent correspondence and a substitution of attorneys  
15 to Mr. Schneider immediately upon retention, but Mr. Schneider did not return the  
16 signed substitution until August 27, 2019, and he did not address undersigned  
17 counsel's request for Chalese's file.  
18

19 9. Outlined in Mr. Schneider's own billing statements, attached to his  
20 Motion to Withdraw, are his failure to conduct any discovery whatsoever.  
21

22 10. On August, 21, 2019, undersigned counsel also sent correspondence to  
23 Mr. Mayo asking for a stipulation to continue the trial, to which Mr. Mayo responded  
24 on August 22, 2019 with his refusal to do so.  
25

26 11. As outlined in Chalese's underlying Motion, Chalese should be  
27 afforded her day in court with adequate counsel, and the court should want to make  
28

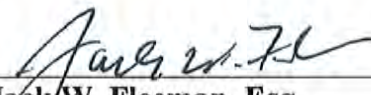


1 a decision in this case based on evidence that has been obtained through an adequate  
2 and proper discovery process.

3  
4 12. The hearing is currently eight weeks out, and the trial is set for October  
5 9 and 10. Discovery cut-off is set for September 9, 2019. If the matter is not heard  
6 sooner, the complete lack of discovery in this case will be severely detrimental to  
7 Chalese. Chalese desperately needs this court's immediate assistance to address this  
8 concern.  
9

10  
11 13. Based on the foregoing, this Motion for an Order Shortening Time is  
12 made in good faith.  
13

14 FURTHER YOUR AFFIANT SAYETH NAUGHT.  
15

16  
17   
18 Jack W. Fleeman, Esq.  
19

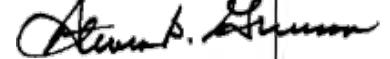
20 This instrument was acknowledged before  
21 me this 29<sup>th</sup> day of August, 2019  
22 by Jack W. Fleeman, Esq.



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NOTARY PUBLIC  
ANGELA ROMERO  
STATE OF NEVADA - COUNTY OF CLARK  
MY APPOINTMENT EXP. JULY 17, 2023  
No: 03-79648-1

NOTARY PUBLIC in and for  
said County and State



1 **OPPC**

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

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

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

19 **OPPOSITION TO DEFENDANT'S MOTION TO CONTINUE**  
20 **TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT**  
21 **ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY**  
**DEADLINES (FIRST REQUEST); AND COUNTERMOTION TO**  
**STRIKE THE SUBSTITUTION OF ATTORNEYS**

22 **NOW INTO COURT** comes Plaintiff, ADAM M. SOLINGER, by  
23 and through his attorney of record, Vincent Mayo, Esq., of The Abrams  
24 & Mayo Law Firm, and hereby submits his *OPPOSITION TO*  
25 *DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE*  
26 *OF NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE*  
27 *TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST); AND*

1 COUNTERMOTION TO STRIKE THE SUBSTITUTION OF  
2 ATTORNEYS.

3 This *Opposition and Countermotion* is made and based upon the  
4 attached Points and Authorities, the Affidavit of Plaintiff and Exhibit  
5 attached hereto, all papers and pleadings on file herein, and any oral  
6 argument adduced at the hearing of this matter.

7 Dated Friday, August 30, 2019.

8 Respectfully Submitted,

9 THE ABRAMS & MAYO LAW FIRM

10 /s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

11 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

12 Las Vegas, Nevada 89118

Attorney for Plaintiff

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 **I. STATEMENT OF FACTS**

15 **Background**

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

1 31 years old and Chalese is 28 years old.

2 The parties separated in October 2018. Chalese obtained counsel  
3 shortly thereafter, Katherine Provost, Esq. Adam, who was representing  
4 himself at the time, spoke with Chalese's counsel about a global  
5 settlement offer. Ms. Provost opined that the offer seemed reasonable  
6 and would speak to Chalese about it. Next thing Adam knew, Chalese  
7 switched attorneys, letting Ms. Provost go and hiring Mr. Schneider in  
8 December 2018.

9 Chalese, unwilling to entertain Adam's offer, decided to litigate.  
10 Adam proceeded accordingly and filed for divorce in January of 2019.  
11 Shortly thereafter, he retained his own counsel and began conducting  
12 discovery. Adam's discovery disclosures have been extensive, addressing  
13 all financial issues. These include the formal marital residence and  
14 Adam's separate interest in the same, his income, the few financial  
15 accounts, the artwork and miscellaneous assets. As for custody, Adam  
16 disclosed medical records, videos, photos, communications and other  
17 information related to the children's bests interest. Adam also  
18 propounded discovery on Chalese.

19 Chalese was notified of the discovery that she and her counsel  
20 could be conduct. A Case Management Conference was held, back in  
21 March of 2019, which Chalese attended during which possible discovery

1 was discussed, including written discovery and depositions. The Court  
2 then issued a scheduling order on March 19, 2019 setting forth discovery  
3 deadlines (including the disclosure of exhibits, witnesses and any other  
4 discovery sought).

5       While Chalese is the client, Mr. Schneider is the attorney and his  
6 role as counsel was to determine what discovery was necessary to  
7 establish Chalese's case and what was not. Based on the limited nature of  
8 the financial issues and information provided by Adam regarding  
9 custody, Mr. Schneider decided not to conduct formal discovery. That  
10 being said, Mr. Schneider did make formal disclosures and filed an  
11 initial FDF, as well as an updated FDF. Mr. Schneider also filed  
12 numerous motions and oppositions and submitted Appendices of  
13 exhibits in support.

14       Chalese stayed with Mr. Schneider for eight-months. Then, just  
15 one month before trial, Chalese tries to switch attorneys. Proposed new  
16 counsel, Mr. Shapiro at Pecos Law Group, reached out to Mr. Mayo  
17 seeking a continuance of trial. Mr. Shapiro was not attorney of record at  
18 that time and had no grounds upon which to seek a continuance.  
19 Regardless, it was conveyed to Mr. Shapiro that a continuance of the  
20 two-day trial would result in extreme prejudice to Adam as the court's  
21 next available dates would not be for another seven to eight months,



1 especially since there are pressing issues that need to be resolved as soon  
2 as possible, the most important one of all being child custody.<sup>1</sup>

3 Further, it was made clear that EDCR 7.40(c) holds, “(c) No  
4 application for withdrawal or substitution may be granted if a delay of  
5 the trial or of the hearing of any other matter in the case would result”  
6 and that his attempting substitution in would essentially have that effect  
7 since he was stating he would have to have a continuance.<sup>2</sup> Mr. Shapiro  
8 was then strongly discouraged from substituting into this matter unless  
9 and if he and/or his office was capable of doing so and getting up to  
10 speed in order to be ready for trial as scheduled.<sup>3</sup>

11 Despite this, Mr. Shapiro filed his Substitution of Attorneys and is  
12 requesting a continuance of trial. This Opposition and Countermotion  
13 follows.

### 14 **III. OPPOSITION AND COUNTERMOTION**

#### 15 **A. Two Day Trial Scheduled for October Should Not be** 16 **Continued**

17 Chalese made her bed and she must now lie on it. Chalese had  
18 retained Katherine Provost, Esq., an experienced, knowledge and expert  
19 divorce attorney. She then ***voluntarily chose to go with lesser***  
20 ***qualified counsel*** – counsel who shared her view of and approach to

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21 <sup>1</sup> See the August 22, 2019 correspondence, attached as **Exhibit 1**.

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

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

1 the case. Now, and just before trial, Chalese has again changed her mind,  
2 wanting to start over again with new counsel. However, Nevada law  
3 specifically holds that she cannot do so if it will result in a continuance of  
4 trial. EDCR 7.40(c) specifically states:

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

7 ***This rule is absolute and does not make any exceptions.***

8 Chalese, in her normal careless way, is nevertheless trying to violate the  
9 rule. This is just another attempted violation of Nevada law on top of the  
10 numerous ones she has already committed and which this court has  
11 repeatedly admonished her for. She does not care that her request would  
12 result in a continuance of the two-day trial until summer of 2020. She  
13 does not care that Adam would be forced to have this divorce, which has  
14 been made contentious due to Chalese's reckless behavior and poor  
15 judgment, drag out for another seven to eight months.

16 Further, Chalese's attempt to claim she nevertheless has a right to  
17 different counsel because she is not happy with her present counsel does  
18 not fly. Ineffective assistance of counsel is a criminal right not available  
19 to litigants in civil cases on the eve of trial. Chalese had a right to seek  
20 counsel months ago if she was not happy with Mr. Schneider but chose  
21 not to.

1       The truth is that Chalese was aware of her rights, having had not  
2 only Mr. Schneider as counsel but Ms. Provost as well (who advised her  
3 of the divorce process). Chalese witnessed Adam sending subpoenas,  
4 listing witnesses, disclosing documentation and propounding discovery.  
5 Hence, if Chalese thought her own discovery - beyond the disclosures  
6 made and her FDFs and witnesses - was necessary, she would have  
7 insisted on it.

8       The Court has seen throughout the litigation that Chalese has  
9 taken a reckless and indifferent approach to the litigation, breaking  
10 court rules and orders as she has liked and focusing more on doing drugs  
11 with her fiancée, neglecting the children, making ridiculous and false  
12 claims (like her statement that Adam had child pornography) and  
13 harassing Adam then she has on her own case. Adam should not be  
14 punished for Chalese's apathetic behavior and procrastination.

15       Being that EDCR 7.40 is absolute, the analysis ends there.  
16 However, there are some points that Adam has to state to make the  
17 record clear. First, Chalese's claim that Adam is trying to avoid discovery  
18 based on his employer's refusal to attend a deposition is false. Mr.  
19 Shapiro attempted to notice Adam's employers' depositions when he had  
20 not made an appearance on the case and Mr. Schneider was still counsel  
21 of record. This means that Mr. Shapiro lacked any subpoena authority,



1 making his subpoena void.

2 Second, Mr. Schneider did not believe additional discovery was  
3 needed to advance Chalese's case. Mr. Shapiro's position that he would  
4 conduct additional discovery if he were Chalese's counsel does not mean  
5 the lack of Mr. Shapiro's requested discovery is sufficient to bypass  
6 EDCR 7.40. Attorney's retain the right to make strategic decisions as to  
7 discovery and Mr. Schneider made that analysis.

8 There are a slew of cases wherein counsel decide that additional  
9 discovery above what is disclosed by either side is not necessary as the  
10 information they have is sufficient to advance case or that trying to  
11 obtain additional discovery is cost prohibitive. This is case is the  
12 presumed situation here. Chalese essentially wants the Court to  
13 speculate as to Mr. Schneider's case strategy in not seeking normal  
14 discovery – something it cannot do. The the only way the Court could  
15 would be to make findings that Mr. Schneider was negligent and reckless  
16 in his representation of Chalese constituting professional misconduct on  
17 his part.<sup>4</sup>

18 Third, and more importantly, *Chalese fails to state what*  
19 *specific information she must have to advance her case.* This is  
20 because there is none. Adam has produced his paystubs and bank

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21 <sup>4</sup> Mr. Schneider's billing statements, while they contain irregularities, do not conclusively establish such a claim.

1 statements that go towards child support and alimony claims. The  
2 marital residence – the only significant asset the parties had – was sold  
3 and Adam provided documentation evidencing his separate property  
4 interest in the home. The parties do not own their own vehicles and  
5 statements have been provided for Adam's small 401k and the prior joint  
6 account and credit account in Adam's name. Plus, the parties have  
7 agreed to a division of the artwork, furnishings, furniture and personal  
8 property. The remaining issue is custody but Chalese has made it clear  
9 throughout the litigation that she is relying on her own testimony and  
10 those of her witnesses to establish her position. Therefore, and as  
11 Chalese makes no *specific* requests for discovery, a *generic* request for  
12 same is insufficient to warrant the continuance of a two-day trial for  
13 seven to eight months to the detriment of Adam and the parties'  
14 children.

15 Fourth, Chalese cannot get around EDCR 7.40 by quoting EDCR  
16 7.30 – or stating Mr. Shapiro is substituting into the case in order to  
17 claim that a continuance is necessary. The rules require Mr. Schneider to  
18 continue to represent the interests of Chalese if and until he is released  
19 (which 7.40 bars him from doing so without court approval) and so the  
20 obligation would be on him to seek a continuance of trial. He has not.

21 ///

1 Therefore, for good cause and the reasons set forth herein,  
2 Chalese's request to continue the two-day trial should be denied.

3 **B. Pecos Law Group's Substitution of Attorneys Should**  
4 **be Stricken**

5 EDCR 7.40 prohibits the substitution of new counsel if the  
6 substitution results in a continuance of trial. That is what Mr. Shapiro is  
7 admitting to, meaning that the attempt to substitute in is against the rule  
8 and void. The Court must therefore strike Pecos Law Group's  
9 Substitution of Attorneys.

10 **III. CONCLUSION**

11 Based on the foregoing, and in addition to this Honorable Court  
12 denying the relief in Chalese's Motion to Continue, the Court should  
13 grant the relief requested in Adam's Countermotion in its entirety.

14 Dated Friday, August 30, 2019.

15 Respectfully Submitted,

16 THE ABRAMS & MAYO LAW FIRM

17 /s/ Vincent Mayo, Esq.

18 Vincent Mayo, Esq.

19 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Plaintiff

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**AFFIDAVIT OF VINCENT MAYO, ESQ.**

STATE OF NEVADA    )  
                                  ) ss:  
COUNTY OF CLARK    )

1. I, VINCENT MAYO, do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

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

3. I make this affidavit in support of the foregoing *OPPOSITION TO DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST); AND COUNTERMOTION TO STRIKE TO SUBSTITUTION OF ATTORNEYS* and hereby certify that the facts set forth in the Points and Authorities attached thereto are true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true. I incorporate said

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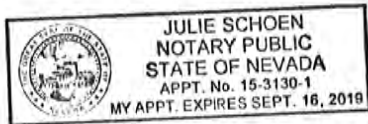
facts into this Affidavit as though fully set forth herein.

FURTHER, AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
VINCENT MAYO, ESQ.

SUBSCRIBED AND SWORN to before  
me this 30<sup>th</sup> day of August, 2019.

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

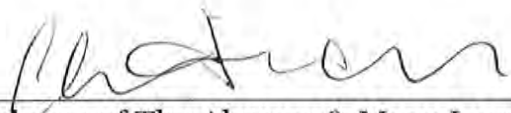


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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *OPPOSITION TO DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST); AND COUNTERMOTION TO STRIKE TO SUBSTITUTION OF ATTORNEY* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Friday, August 30, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Bruce Shapiro, Esq.  
Attorney for Defendant

  
An Employee of The Abrams & Mayo Law Firm



MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

ADAM MICHAEL SOLINGER

Plaintiff/Petitioner

v.

CHALESE MARIE SOLINGER

Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

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

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

Party filing Motion/Opposition: Plaintiff/Petitioner Date 08/30/2019

Signature of Party or Preparer



000622

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1





†† Jennifer V. Abrams, Esq.  
† Vincent Mayo, Esq.

6252 South Rainbow Blvd., Suite 100  
Las Vegas, Nevada 89118  
P. 702.222.4021 F. 702.248.9750  
www.TheAbramsLawFirm.com

Thursday, August 22, 2019

Bruce I. Shapiro, Esq.  
8925 South Pecos Rd., Suite 14 A  
Henderson, Nevada 89074

Re: Adam M. Solinger v. Chalese M. Solinger  
Case Number: D-19-582245-D

**Urgent Attention is Requested**

Dear Mr. Shapiro:

I am in receipt of your letter of yesterday's date. As to the September 3<sup>rd</sup> hearing, it is still set for that day.

In regard to your request to continue trial, we are strongly opposed to any continuance. Both sides stipulated that at least two full days trial were required due to the number of issues and evidence to be presented. When we requested those two full days, it was in March of this year. At that time, the Court's first available two days of trial were October 2019 – 7 months. Seeking a continuance for two full days of trial would mean trial would not be until April or May of 2020. This is fundamentally unfair and prejudicial to my client as discovery is almost complete and there are pressing issues that need to be resolved as soon as possible, the most important one of all being child custody.

Further, EDCR 7.40(c) states that, "(c) No application for withdrawal or substitution may be granted if a delay of the trial or of the hearing of any other matter in the case would result." That is what you are proposing in attempting to substitute into this matter. I therefore strongly discourage you from substituting into this matter unless and if you are capable of doing so and getting up to speed in order to be ready for trial. If you do, I will be forced to argue you did so knowing you could diligently take on the matter and be prepared for trial in October. This would be in line with your obligation under NRPC 3.2 to expedite litigation in your client's interest and not action contrary to it.

Sincerely,

THE ABRAMS & MAYO LAW FIRM

/s/ Vincent Mayo

Vincent Mayo, Esq.

CC: Mr. Adam Solinger

---

† Board Certified Family Law Specialist

\* Fellow of the American Academy of Matrimonial Lawyers; Admitted in Nevada, California, and Louisiana

000624

*Steven D. Grierson*

1 **OST**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

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

13 **Adam Michael Solinger,**

14 **Plaintiff,**

15 **vs.**

16 **Chalese Marie Solinger,**

17 **Defendant.**

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

Dept No. **I**

09/06/2019

1:30 p.m.

**ORDER SHORTENING TIME**

21 Upon application of counsel for the Defendant, Bruce I. Shapiro, Esq, and  
22 Jack W. Fleeman, Esq., of PECOS LAW GROUP, and good cause appearing therefore:  
23  
24  
25

26 ...

27 ...

28

DATED this 4 day of Sept., 2019.


DISTRICT COURT JUDGE

**Bruce I. Shapiro, Esq.**  
Nevada Bar No. 4050  
**Jack W. Fleeman, Esq.**  
Nevada Bar No. 010584  
8925 S. Pecos Road, Suite 14A  
Henderson, NV 89074  
*Attorneys for Defendant*

FILED IN OPEN COURT

September 6, 2019

STEVEN D. GRIERSON  
CLERK OF THE COURT



ANTORIA PICKENS

DEPUTY

ORD

DISTRICT COURT  
CLARK COUNTY, NEVADA

Adam Solinger  
PLAINTIFF

CASE NUMBER: D. 19-88245-D

DEPARTMENT: I

VS.  
Charles Solinger  
DEFENDANT.

Date of Conference: 10.9.19

Time of Conference: 9:00 AM

CASE AND NON-JURY TRIAL MANAGEMENT ORDER

This order sets forth critical dates and times for the major proceedings in this case. It is the responsibility of the attorneys, or the litigants (when appearing in proper person), to meet the deadlines and to appear for the following required proceedings:

CALENDAR CALL DATE:

N/A

NON-JURY TRIAL DATE:

10.9.19 / 10.10.19

PRETRIAL MEMORANDUM DUE:

10.4.19

DISCOVERY CLOSES ON:

10.4.19

1  
2 This matter having come on for a Case Management  
3 Conference, pursuant to NRCP 16.2, in the Family Division, Department  
4 I, of the Eighth Judicial District Court, County of Clark, and Plaintiff,  
5 being represented by V. Mayo, and Defendant,  
6 being represented by B. Shapiro, and the Court  
7 being fully advised in the premises, both as to subject matter as well as  
8 the parties thereto, and that jurisdiction is proper in Nevada, and good  
9 cause appearing, the court makes the following findings:  
10  
11  
12

13 The parties shall participate in the discovery process in good  
14 faith and may utilize all discovery methods, consistent with NRCP 16.2.  
15

16 Within 15 days of this Order, the parties shall submit a list of names  
17 of individuals who are likely to possess discoverable information  
18 regarding this action, consistent with NRCP 16.2(a)(2)(A) and a list of all  
19 documents provided at or as a result of the Case Management  
20 Conference consistent with NRCP 16.2(a)(2)(B).  
21  
22

23 The Pre-Trial Memorandum shall substantially comply with the  
24 form attached hereto including the Asset and Debt Schedules. Failure to  
25 submit the Pre-Trial Memorandum on or before this date, absent the  
26  
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28

1 Court's approval, will result in the trial date being vacated and the  
2 matter rescheduled in ordinary course and/or sanctions.  
3

4 **Failure to appear at the Calendar Call may result in a**  
5 **default judgment, or other sanctions, consistent with**  
6 **EDCR 2.69.**  
7

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10 Counsel or proper person litigants are to provide the following  
11 to opposing counsel/proper person litigant with the following prior to  
12 the calendar call:  
13

- 14 1. List of witnesses  
15  
16 2. List of exhibits  
17  
18 3. Any other discovery items sought to be introduced at trial.

19 **Failure to provide the above foregoing may result in**  
20 **such witnesses, exhibits, or evidence being excluded or**  
21 **other appropriate court-imposed sanctions against**  
22 **counsel or party in proper person.**  
23  
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25  
26 Any and all Exhibits and Witness Lists (a set of original exhibits  
27 ready for marking by the Clerk with a courtesy copy for the Court), must  
28

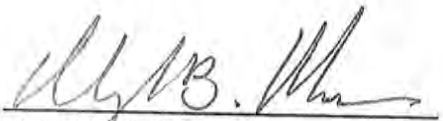


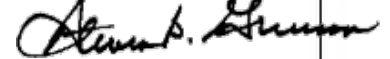
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2 be delivered to chambers at least two (2) judicial days prior to trial for  
3 marking.

4 Absent stipulation of the parties (and good cause appearing  
5 therefore), no continuances will be granted to either party unless written  
6 application is made to the Court, served upon opposing counsel, and a  
7 hearing held at least three (3) days prior to the time of trial. If this matter  
8 settles, please advise the Court as soon as possible.  
9  
10

11 IT IS HEREBY ORDERED that the above-stated findings are  
12 hereby adopted and confirmed as an order of this Court.  
13  
14

15 DATED this 6 day of SEPTEMBER, 2019.  
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20 CHERYL B. MOSS  
21 District Court Judge CHERYL B. MOSS  
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1 WTLT  
2 **Bruce I. Shapiro, Esq.**  
3 Nevada Bar No. 4050  
4 **Jack W. Fleeman, Esq.**  
5 Nevada Bar No. 10584  
6 PECOS LAW GROUP  
7 8925 South Pecos Road, Suite 14A  
8 Henderson, Nevada 89074  
9 Telephone: (702) 388-1851  
10 Facsimile: (702) 388-7406  
11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)  
12 *Attorney for Defendant*

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

11 **Adam Michael Solinger,**

12 Plaintiff,

13 vs.

14 **Chalese Marie Solinger,**

15 Defendant.

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

Dept No. **I**

16 **DEFENDANT, CHALESE SOLINGER'S LIST OF WITNESSES FOR TRIAL**

17 TO: ADAM MICHAEL SOLINGER, Plaintiff; and

18 TO: VINCENT MAYO, ESQ. and JENNIFER V. ABRAMS, ESQ., attorneys  
19 for Plaintiff.

20 COMES NOW Defendant, **Chalese Marie Solinger**, by and through her  
21 attorney of record, **Bruce I. Shapiro, Esq.**, of PECOS LAW GROUP, and hereby  
22 submits her List of Witnesses for Trial.  
23  
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25  
26



**WITNESSES**

- 1  
2       **1.**     Adam Michael Solinger, Plaintiff  
3             c/o Vincent Mayo, Esq.  
4             Jennifer V. Abrams, Esq.  
5             THE ABRAMS & MAYO LAW FIRM  
6             6252 S. Rainbow Blvd., Ste. 100  
7             Las Vegas, NV 89118  
8             Tel: (702) 222-4021

9  
10            Mr. Solinger will testify regarding the facts and circumstances  
11            surrounding the parties' marriage, financial and child custodial  
12            matters.

- 13  
14       **2.**     Chalese Solinger, Defendant  
15             c/o Bruce I. Shapiro, Esq.  
16             Jack W. Fleeman, Esq.  
17             PECOS LAW GROUP  
18             8925 S. Pecos Rd., Ste. 14A  
19             Henderson, NV 89074  
20             Tel: (702) 388-1851

21  
22            Ms. Solinger will testify regarding the facts and circumstances  
23            surrounding the parties' marriage, financial and child custodial  
24            matters.

- 25  
26       **3.**     Curtis D. Child APRN-BC  
              Las Vegas Psychiatry  
              9402 W. Lake Mead Blvd., Ste. 110  
              Las Vegas, NV 89134  
              Tel: (805) 244-5385

              Mr. Child is Defendant's medical provider, and he will testify  
              regarding his treatment of Defendant.

- 4.**     Brad Singletary, LCSW  
              1070 W. Horizon Ridge Pkwy., #200  
              Henderson, NV 89012  
              Tel: (702) 758-4949

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Mr. Singletary is Defendant's therapist, and he will testify regarding his treatment of Defendant.

- 5. Catrina Jenkins Bolick  
2430 Vanderbilt Beach Rd., Ste. 108-314  
Naples, FL 34109  
Tel: (775) 233-5377

Ms. Jenkins Bolick is Defendant's friend, and she will testify as to Plaintiff's behavior and interaction between the parties.

- 6. Nick Bolick  
2430 Vanderbilt Beach Rd., Ste. 108-314  
Naples, FL 34109  
Tel: (775) 240-2679

Mr. Bolick is Defendant's friend, and he will testify as to Plaintiff's behavior and interaction between the parties.

- 7. Tasha Jenkins  
7049 Salt Marsh Ct.  
Las Vegas, NV 89148  
Tel: (702) 446-5437

Ms. Jenkins is Defendant's friend, and she will testify as to Plaintiff's behavior and interaction between the parties.

- 8. Mary Boyce  
2141 S. 5400 W.  
Malad, ID 83252  
Tel: (208) 766-3937

Ms. Boyce is Defendant's friend, and she will testify as to Plaintiff's behavior, parenting and interaction between the parties.

- 9. Scott Boyce  
2141 S. 5400 W.  
Malad, ID 83252  
Tel: (208) 766-3937

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Mr. Boyce is Defendant's friend, and he will testify as to Plaintiff's behavior, parenting and interaction between the parties.

- 10. Sergeant Oliver Colt Larson  
4700 Falcon Way  
Crestview, FL 32539  
Tel: (775) 233-5354

Sergeant Larson is Defendant's friend, and he will testify as to Plaintiff's behavior, parenting and interaction between the parties.

- 11. Joshua Lloyd  
2256 Grand Clover Ln.  
Las Vegas, NV 89156  
Tel: (725) 202-5525

Mr. Lloyd is Defendant's boyfriend, and he will testify as to Plaintiff's behavior, parenting and interaction between the parties.

- 12. Christian Lloyd  
2256 Grand Clover Ln.  
Las Vegas, NV 89156  
Tel: (702) 488-7547

Mr. Lloyd is Defendant's boyfriend's father, and he will testify as to Plaintiff's behavior, parenting and interaction between the parties.

- 13. Dave Martin  
4982 N. Tioga Way  
Las Vegas, NV 89149  
Tel: (702) 682-5991

Mr. Martin is Defendant's previous employer, and he will testify as to Defendant's behavior and parenting.

- 14. Any and all witnesses relied upon by the Plaintiff.
- 15. Any and all rebuttal witness.

...

1 Defendant reserves the right to supplement this list as additional  
2 information and witnesses become available.

3 DATED this 9 day of September, 2019.

4 PECOS LAW GROUP

5  
6 

7 **Bruce I. Shapiro, Esq.**

8 Nevada Bar No. 4050

9 **Jack W. Fleeman, Esq.**

10 Nevada Bar No. 10584

11 8925 S. Pecos Rd., Suite 14A

12 Henderson, Nevada 89074

13 (702) 388-1851

14 *Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW GROUP, and that on this 9<sup>th</sup> day of September, 2019, I served a copy of **DEFENDANT, CHALESE SOLINGER'S LIST OF WITNESSES FOR TRIAL** as follows:


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

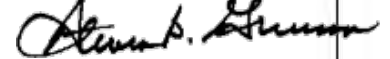
☒ Pursuant to NEFCR 9, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system: and/or

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

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

Vincent Mayo	VMGroup@TheAbramsLawFirm.com
admin email	email@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Amy Robinson	amy@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com
Bruce Shapiro	bruce@pecoslawgroup.com

  
\_\_\_\_\_  
ANGELA ROMERO  
An employee of PECOS LAW GROUP



1 **NOT**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

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

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

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

Dept No. **I**

**NOTICE OF INTENT TO FILE OPPOSITION TO PRIOR COUNSEL'S  
MOTION TO ADJUDICATE ATTORNEY'S LIEN**

20 COMES NOW **Chalese Solinger** ("Chalese") by and through her attorney of  
21 record, **Bruce I. Shapiro, Esq.** of Pecos Law Group and hereby notices Plaintiff,  
22 counsel, and prior counsel that she intends to file an opposition to Louis C.  
23 Schneider's Motion to Adjudicate Attorney's Lien, filed in conjunction with his  
24 motion to withdraw on August 23, 2019.

27 Chalese intends to submit a full opposition this week, but summarizes her  
28 opposition in stating that Mr. Schneider's fees, as illustrated through his billing

1 statements, were unreasonable. Pursuant to NRPC 1.5 "a lawyer shall not . . . charge,  
2 or collect an unreasonable fee . . . ."

3  
4 DATED this 9<sup>th</sup> day of September, 2019.

6 PECOS LAW GROUP

7 

8 **Bruce I. Shapiro, Esq.**

9 Nevada Bar No. 004050

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

11 Nevada Bar No. 010584

12 PECOS LAW GROUP

13 8925 South Pecos Road, Suite 14A

14 Henderson, Nevada 89074

15 Attorneys for Defendant  
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I hereby certify that the foregoing "*NOTICE OF INTENT TO FILE OPPOSITION TO PRIOR COUNSEL'S MOTION TO ADJUDICATE ATTORNEY'S LIEN*" in the above-captioned case was served this date by e-service, pursuant to Rule 9 of N.E.F.C.R., E.D.C.R. 7.26(a)(4), and E.J.D.C. AO 9-12 and AO 14-2, to the following email(s), which is/are the email(s) registered with the electronic filing system:

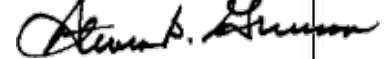
Vincent Mayo	VMGroup@TheAbramsLawFirm.com
admin email	email@pecoslawgroup.com
Jack Fleeman	jack@pecoslawgroup.com
Amy Robinson	amy@pecoslawgroup.com
Angela Romero	angela@pecoslawgroup.com
Louis Schneider	lcslawllc@gmail.com
Louis Schneider	lcslawllc@gmail.com
Bruce Shapiro	bruce@pecoslawgroup.com

DATED this 9th day of September, 2019.



**Angela Romero,**  
An Employee of PECOS LAW GROUP





1 **OPP**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 **PECOS LAW GROUP**

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

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

14 **Adam Michael Solinger,**

15 Plaintiff,

16 vs.

17 **Chalese Marie Solinger,**

18 Defendant.

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

Dept No. **I**

Hearing Date: October 9, 2019

Hearing Time: 2:30 a.m.

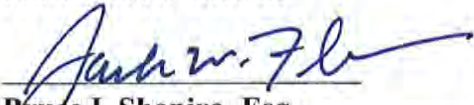
19 **OPPOSITION TO LOUIS C. SCHNEIDER'S**  
20 **MOTION TO ADJUDICATE ATTORNEY'S LIEN**

21 **COMES NOW** Defendant **Chalese Marie Solinger** ("Chalese") by and  
22 through her attorneys, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman, Esq.** of  
23 **PECOS LAW GROUP** and hereby opposes Louis C. Schneider's Motion to  
24 Adjudicate Attorney's Lien.  
25  
26

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

4 DATED this 13 day of September, 2019.

6 PECOS LAW GROUP

7   
8 **Bruce I. Shapiro, Esq.**  
9 Nevada Bar No. 004050

10 **Jack W. Fleeman, Esq.**  
11 Nevada Bar No. 010584

12 PECOS LAW GROUP

13 8925 South Pecos Road, Suite 14A  
14 Henderson, Nevada 89074  
15 Attorneys for Defendant  
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1 **POINTS AND AUTHORITIES**

2 **A. Mr. Schneider's Motion Must Be Denied Because He Has Failed to**  
3 **Demonstrate the Reasonableness of His Fees.**

4 The entirety of Mr. Schneider's motion to adjudicate consists of legal  
5 authorities in support of his ability to assert a lien and the court's authority to  
6 "adjudicate the rights of the attorney...and enforce the lien." Nothing in Mr.  
7 Schneider's motion provides any legal authority in support of his request for the  
8 fees he seeks to collect, nor any facts to show that the amount of \$15,425.00 is  
9 reasonable.

10  
11 It is Mr. Schneider's burden to demonstrate that his fee is reasonable  
12 pursuant to NRPC 1.5. In determining reasonableness, Rule 1.5 states, in relevant  
13 part:

14 (a) A lawyer shall not make an agreement for,  
15 charge, or collect an unreasonable fee or an  
16 unreasonable amount for expenses. The factors to be  
considered in determining the reasonableness of a fee  
include the following:

17 (1) The time and labor required, the novelty and  
18 difficulty of the questions involved, and the skill  
requisite to perform the legal service properly;

19 (2) The likelihood, if apparent to the client, that  
20 the acceptance of the particular employment will  
preclude other employment by the lawyer;

21 (3) The fee customarily charged in the locality  
for similar legal services;

22 (4) The amount involved and the results  
obtained;

23 (5) The time limitations imposed by the client  
24 or by the circumstances;

- (6) The nature and length of the professional relationship with the client;
- (7) The experience, reputation, and ability of the lawyer or lawyers performing the services; and
- (8) Whether the fee is fixed or contingent.

These reasonableness factors are further explained in *Brunzell v. Golden Gate Nat. Bank*, wherein the Nevada Supreme Court provided that when considering an award of fees to an attorney, the court must consider:

- (1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill;
- (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation;
- (3) the work actually performed by the lawyer: the skill, time and attention given to the work; and
- (4) the result: whether the attorney was successful and what benefits were derived.

85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

In *Logan v. Abe*, the Court added that an award of fees must “demonstrate that [the court] considered the required [Brunzell] factors, and the award must be supported by substantial evidence.” 131 Nev. Adv. Op. 31, 350 P.3d 1139, 1143 (2015).

Again, in this case Mr. Schneider has failed to explain the reasonableness of his fees, let alone submit a proper *Brunzell* affidavit. Thus, his request to adjudicate his lien must be denied.

...

...

...

1 **B. Even if Mr. Schneider Had Filed a Proper *Brunzell* Affidavit, His**  
2 **Billing in this Case, as Exemplified in His Billing Statements, Was Not**  
3 **Reasonable.**

4 Mr. Schneider's billing statement, attached as Exhibit 2 to his motion,  
5 shows that Chalese paid him \$10,000 between the months of December 2018 and  
6 May 2019.<sup>1</sup> In addition to that \$10,000, Mr. Schneider contends that he  
7 performed an additional \$15,425.00 of work between the period of December  
8 2018 to August 15, 2019.

9 To go through and challenge every one of Mr. Schneider's billing entries,  
10 especially when it is Mr. Schneider's burden to prove the reasonableness of his  
11 fees, would be unfair to Chalese. As such, undersigned counsel sets for the  
12 following list of highlights to illustrate the gross unreasonableness in Mr.  
13 Schneider's conduct and alleged fees:

14 1. Mr. Schneider's fee agreement provides that Chalese  
15 was to pay her bill within fifteen (15) days of the billing date. It also  
16 later provides that it is the "Firm's practice to periodically send a  
17 statement ... [that] will inform the Client of both the nature of the  
18 litigation-related fees . . . ." Despite these provisions, Mr. Schneider  
19 never sent Chalese billing statements. The one billing statement he  
20 provides to the court now is the only statement Chalese has ever  
21

22 <sup>1</sup> At the end of May 2019, Mr. Schneider demanded that Chalese pay \$5,000 (making it  
23 \$10,000 total) to retain an expert for the case. However, it appears now that Mr. Schneider paid  
24 himself with that \$5,000 and never retained the expert, as promised.

1 seen. Consequently, she was never given an opportunity to  
2 challenge Mr. Schneider's billing until now.

3 2. Upon information and belief, Mr. Schneider's billed  
4 time is not reliable. *The following facts show that Mr. Schneider's*  
5 *time is not reliable:*

6 a. At the end of his billing statement, Mr.  
7 Schneider includes a \$774.00 fee for 86 email conversations that  
8 allegedly occurred from January to August 2019. This entry clearly  
9 shows that Mr. Schneider was not tracking his time in a reasonable  
10 manner and that at least this entry was added on to the billing  
11 statement at the last minute without any thought as to its legitimacy.  
12

13 b. Mr. Schneider charged an inordinate amount to  
14 review standard boilerplate documents. For example, he billed a  
15 total of 1.0 hour to review the summons, request for JPI, JPI, proof  
16 of service, and the client's confidential information sheet. That is a  
17 total of \$450 to review documents that are standard in every case,  
18 and that would take no more than 5 minutes to review.  
19

20 c. On February 7, 2019, Mr. Schneider charged 2  
21 hours of time to draft a Motion to Set Aside Default that contains  
22 approximately 3 pages of substance. *On the same day, Mr.*  
23 *Schneider charged another 2 hours of time to prepare and file an*  
24

1        *Amended Motion to Set Aside Default that is identical except for*  
2        *its request for oral argument.*

3                d.        On May 3, 2019, Mr. Schneider billed 0.5 hours  
4        (\$225) to review a notice of entry of an order. This review would  
5        have taken less than a minute, and is arguably not even a billable  
6        event.

7  
8                e.        On May 15, 2019, Mr. Schneider billed 0.5 hours  
9        (\$225) to review an expert witness list that consisted of two people's  
10       names. Again, this was probably reviewed in one minute.

11               f.        On August 1, 2019, Mr. Schneider billed 3.0  
12       hours related to a hearing on a motion for order to show cause. This  
13       hearing should not have occurred because the Motion (that does not  
14       appear to be in the billing records) at issue, did not comply with  
15       rules regarding motions for OSCs, was agreed to be stricken from  
16       the record because it was deficient. The court at this hearing also  
17       directed Mr. Schneider to seek an OSC that complied with court  
18       rules. He never did so.

19  
20               3.        Mr. Schneider's billing statements show, that despite  
21       this being a highly contested divorce action, including custody, *he*  
22       *conducted no discovery on Chalese's behalf. This failure, among*  
23       *others such as filing the improper motion for an OSC, has resulted*  
24       *in the need for Chalese to seek new counsel and to incur*

1       *additional fees.* Thus, the “result obtained” from Mr. Schneider was  
2       clearly not reasonable.

3       In sum, Mr. Schneider’s one and only billing statement, which he did not  
4       provide to Chalese, and likely did not even create, prior to his instant motion,  
5       shows that his billing is not only excessive and unreasonable, but is also  
6       unreliable.

7  
8                                   CONCLUSION

9       WHEREFORE, based on the foregoing, Chalese respectfully requests that  
10      this Court deny Louis C. Schneider’s motion in its entirety.

11      DATED this 13 day of September, 2019.

12                                   PECOS LAW GROUP

13                                     
14                                   Bruce I. Shapiro, Esq.

15                                   Nevada Bar No. 004050

16                                   **Jack W. Fleeman, Esq.**

17                                   Nevada Bar No. 010584

18                                   PECOS LAW GROUP

19                                   8925 South Pecos Road, Suite 14A

20                                   Henderson, Nevada 89074

21                                   Attorneys for Defendant  
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**DECLARATION OF CHALESE SOLINGER**

1. I am over the age of 18, and I am competent to testify to the matters contained herein.

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

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

  
\_\_\_\_\_  
Chalese Solinger


9/13/19  
\_\_\_\_\_  
Dated

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that the foregoing "OPPOSITION  
3 TO LOUIS C. SCHNEIDER'S MOTION TO ADJUDICATE ATTORNEY'S LIEN"  
4 in the above-captioned case was served this date by e-service, pursuant to Rule 9  
5 of N.E.F.C.R., E.D.C.R. 7.26(a)(4), and E.J.D.C. AO 9-12 and AO 14-2, to the  
6 following email(s), which is/are the email(s) registered with the electronic filing  
7 system:  
8

9 Vincent Mayo	VMGroup@TheAbramsLawFirm.com
10 admin email	email@pecoslawgroup.com
11 Jack Fleeman	jack@pecoslawgroup.com
12 Amy Robinson	amy@pecoslawgroup.com
13 Angela Romero	angela@pecoslawgroup.com
14 Louis Schneider	lcslawllc@gmail.com
15 Bruce Shapiro	bruce@pecoslawgroup.com

16  
17 DATED this 13<sup>th</sup> day of September, 2019.

18   
19 \_\_\_\_\_  
20 Angela Romero,  
21 An Employee of PECOS LAW GROUP  
22  
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MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam Michael Solinger  
Plaintiff/Petitioner

v. Chalese Marie Solinger  
Defendant/Respondent

Case No. D-19-582245-0

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

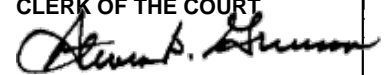
**Step 3.** Add the filing fees from Step 1 and Step 2.

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

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

Party filing Motion/Opposition: Defendant Date 9/13/19

Signature of Party or Preparer 



DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

ADAM MICHAEL  
SOLINGER, PLAINTIFF  
VS.  
CHALESE MARIE  
SOLINGER, DEFENDANT.

CASE NO: D-19-582245-D  
DEPARTMENT I

**NOTICE OF RESCHEDULING OF HEARING**

Please be advised that the date and time of a hearing set before the **Honorable CHERYL B. MOSS** has been changed. The **Motion to Withdraw and Adjudicate Attorney's Lien and Defendant's Opposition to Motion to Adjudicate Attorney's Lien**, presently scheduled for **October 09, 2019, at 2:30 AM**, has been rescheduled to the **9<sup>th</sup> day of October, 2019, at 9:00 AM in Courtroom 13.**

**YOUR PRESENCE IS NECESSARY.**

**HONORABLE CHERYL B. MOSS**


By: 

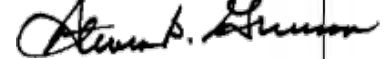
Suzanna Zavala  
Judicial Executive Assistant

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Notice to be served by E-SERVICE AND EMAIL to:

**BRUCE I. SHAPIRO, ESQ.**  
**JACK W. FLEEMAN, ESQ.**  
 8925 South Pecos Rd., Suite 14A  
 Henderson, NV 89074  
[email@pecoslawgroup.com](mailto:email@pecoslawgroup.com)  
 Attorney for Defendant

  
Suzanna Cavala  
Judicial Executive Assistant  
Department I



1 **NOPC**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 4050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 10584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

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

13 **Adam Michael Solinger,**

14 Plaintiff,

15 vs.

16 **Chalese Marie Solinger,**

17 Defendant.

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


Dept No. **I**

**NOTICE OF SEMINAR COMPLETION**

20 Please see attached as Defendant, CHALESE SOLINGER's Notice of Seminar  
21 Completion of the UNLV Cooperative Parenting Program.

22 DATED this 17 day of September, 2019.

23 PECOS LAW GROUP

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

26 Nevada State Bar No. 4050

27 8925 S. Pecos Rd., Suite 14A

28 Henderson, NV 89074

Tel: (702) 388-1851

*Attorney for Defendant*



September 16, 2019

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

Re. Chalese Solinger  
*Adam Solinger, Plaintiff vs. Chalese Solinger, Defendant*  
Case No. D-19-582245-D

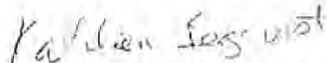
Dear Judge Moss,

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

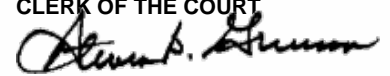
*Chalese Solinger*

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

Sincerely,



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



1 NOPC  
2 UNLV Division of Educational Outreach  
3 Kathleen Ja Soo Bergquist, Esq.  
4 851 East Tropicana  
5 Las Vegas, Nevada 89119  
6 702 895 3394 TEL  
7 702 895 4195 FAX  
8 continuing.education@unlv.edu

6 DISTRICT COURT, FAMILY DIVISION  
7 CLARK COUNTY, NEVADA

8 \* \* \*

9 Adam Solinger,  
10 Plaintiff,  
11 vs.  
12 Chalese Solinger  
13 Defendant.

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

13 **NOTICE OF SEMINAR COMPLETION**  
14 **EDCR 5.07**

15  
16 Defendant, Chalese Solinger, hereby submits Exhibit 1, attached hereto, attesting to their  
17 completion of the Cooperative Parenting Course offered by the University of Nevada Las  
18 Vegas.

19  
20 DATED this 17th day of September  
21 2019.



22  
23 Kathleen Ja Soo Bergquist, Esq.  
24 UNLV Division of Educational Outreach  
25 851 East Tropicana  
26 Las Vegas, Nevada 89119  
27 702 895 3394 TEL  
28 702 895 4195 FAX  
continuing.education@unlv.edu



September 16, 2019

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

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

Dear Judge Moss,

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

*Chalese Solinger*

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

Sincerely,



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

*Steven D. Grierson*

**AFFR**

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

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

**AFFIDAVIT OF RESIDENT WITNESS**

STATE OF NEVADA )  
COUNTY OF CLARK ) ss:

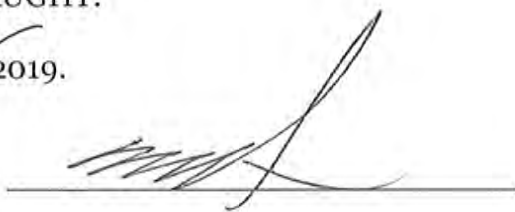
1. I, Michael V. Castillo, do solemnly  
swear to testify herein to the truth, the whole truth and  
nothing but the truth.

2. That I live at 3851 Zodiac Light St.  
Las Vegas, NV 89129

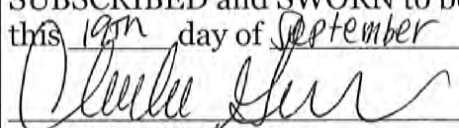
- 1 3. That I first moved to Clark County, Nevada in  
2 approximately August of 2001.  
3 4. That I first saw Plaintiff in Clark County, Nevada in  
4 2015.  
5 5. That since that date, I have seen Plaintiff physically present  
6 in Clark County, Nevada approximately 4 days per  
7 week.  
8 6. That I know Plaintiff's residence to be 7290 Sea  
9 Anchor Court Las Vegas NV 89131.  
10 7. That I know Plaintiff has resided at the residence since  
11 July 2019.  
12 8. That I am personally acquainted with the Plaintiff and know  
13 of my own personal knowledge that Plaintiff is a bona fide  
14 resident of Clark County, Nevada.

15 FURTHER AFFIANT SAYETH NAUGHT.

16 Dated this 19 day of September, 2019.

17  
18 

19 SUBSCRIBED and SWORN to before me  
20 this 19th day of September, 2019.

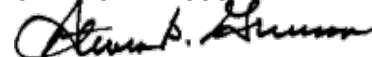
21   
NOTARY PUBLIC



**FDF**

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

Electronically Filed  
9/24/2019 3:29 PM  
Steven D. Grierson  
CLERK OF THE COURT



Eighth Judicial District Court  
Family Division  
Clark County, Nevada

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

**GENERAL FINANCIAL DISCLOSURE FORM****A. Personal Information:**

1. What is your full name? (first, middle, last) ADAM MICHAEL SOLINGER
2. How old are you? 30
3. What is your date of birth? 07/01/1988
4. What is your highest level of education? Law School

**B. Employment Information:**

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

Date of Hire	Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
June 2015	Las Vegas Defense Grp.	Lead Attorney	Sunday - Saturday	9a-6p, but flexible

2. Are you disabled? (☒ check one)

☒ No  
☐ Yes

If yes, what is your level of disability? \_\_\_\_\_  
What agency certified you disabled? \_\_\_\_\_  
What is the nature of your disability? \_\_\_\_\_

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

Prior Employer: \_\_\_\_\_ Date of Hire: \_\_\_\_\_ Date of Termination: \_\_\_\_\_  
Reason for Leaving: \_\_\_\_\_

## Monthly Personal Income Schedule

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

As of the pay period ending September 11, 2019, my gross year to date pay is \$85,000.

### 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

\$120,000	÷	12	=	\$10,000
Annual Income		Months		Gross Monthly Income

### C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses	Varies	\$3,000/year	\$250
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			\$250

Total Average Gross Monthly Income (add totals from B and C above)	\$10,250
--------------------------------------------------------------------	----------

**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	1,062.48
4.	Health Insurance Amount for you: _____ For Opposing Party: _____ For your Child(ren): _____	
5.	Life, Disability, or Other Insurance Premiums	
6.	Medicare	145.00
7.	Retirement, Pension, IRA, or 401(k)	700.00
8.	Savings	
9.	Social Security	620.00
10.	Union Dues	
11.	Other: (Type of Deduction)	
<b>Total Monthly Deductions (Lines 1-11)</b>		<b>\$2,527.48</b>

**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:			
<b>Total Average Business Expenses</b>			



### Personal Expense Schedule (Monthly)

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

Expense	Monthly Amount I Pay	For Me <input type="checkbox"/>	Other Party <input type="checkbox"/>	For Both <input type="checkbox"/>
Alimony/Spousal Support				
Auto Insurance				
Car Loan/Lease Payment				
Cell Phone				
Child Support/Familial Support	1,330.00	X		
Clothing, Shoes, Etc...	150.00	X		
Credit Card Payments (minimum due)	250.00	X		
Dry Cleaning	20.00	X		
Electric	400.00	X		
Food (groceries & restaurants)	500.00	X		
Fuel	400.00	X		
Gas (for home)	124.82	X		
Health Insurance (not deducted from pay)				
HOA				
Home Insurance (if not included in mortgage)	75.00	X		
Home Phone				
Internet/Cable	280.00	X		
Lawn Care				
Membership Fees	20.00	X		
Mortgage/Rent/Lease	1,500.00	X		
Pest Control				
Pets	80.00	X		
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer				
Student Loans				
Unreimbursed Medical Expense	60.00	X		
Water				
Other:				
Child expenses from page 5	2,641.00			
<b>Total Monthly Expenses</b>	<b>7,830.82</b>			

### Household Information

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

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

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

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

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

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



### Personal Asset and Debt Chart

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

Line	Description of Asset and Debt Thereon	Gross Value	Total Amount Owed	Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Proceeds from Marital Residence	\$ 168,000	- \$ 0	= \$ 168,000	Both
2.	2017 Moto Guzzi Café Racer VIII	\$ 5,000	- \$ 0	= \$ 5,000	Adam
3.	Forest River Travel Trailer	\$ 5,000	- \$ 0	= \$ 5,000	Both
4.	Bank of America, checking	\$ 1,352.67	- \$ 0	= \$ 1,352.67	Adam
5.	Art collection	\$ Unknown	- \$ 0	= \$ Unknown	Adam/Both
6.	Roth 401k	\$ 21,229	- \$ 0	= \$ 21,229	Adam
7.	Charles Schwab	\$ Unknown	- \$ Unknown	= \$ Unknown	Chalese
8.	Firearms	\$ 7,500	- \$ 0	= \$ 7,500	Adam/Both
9.		\$	- \$	= \$	
10.		\$	- \$	= \$	
11.		\$	- \$	= \$	
12.		\$	- \$	= \$	
13.		\$	- \$	= \$	
14.		\$	- \$	= \$	
15.		\$	- \$	= \$	
<b>Total Value of Assets (add lines 1-15)</b>		<b>\$ 208,081.67</b>	<b>- \$</b>	<b>= \$ 208,081.67</b>	

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


Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Bank of America credit card	\$ 1,168.51	Adam
2.	Capital One credit card	\$ Unknown	Chalese
3.		\$	
4.		\$	
5.		\$	
6.		\$	
<b>Total Unsecured Debt (add lines 1-6)</b>		<b>\$ 1,168.51</b>	


## CERTIFICATION

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

1. I have retained an attorney for this case.
2. As of the date of today, the attorney has been paid a total of \$ 42,074 on my behalf.
3. I have a credit with my attorney in the amount of \$ 5,000.00.
4. I currently owe my attorney a total of \$ 0.00.
5. I owe my prior attorney a total of \$ N/A.

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

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

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

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

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

  
Signature

9/20/17  
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)* September 24, 2019, service of the General Financial Disclosure Form was made to the following interested parties in the following manner:

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

\_\_\_\_\_

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

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

Executed on the 24<sup>th</sup> day of September, 2019.

  
Signature

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	576
IHJ	100126	000100	XN50K	0000330015	1

LAS VEGAS DEFENSE GROUP  
2970 W. SAHARA AVENUE  
LAS VEGAS, NV 89102

## Earnings Statement



Period Beginning: 07/27/2019  
Period Ending: 08/11/2019  
Pay Date: 08/15/2019

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 3  
NV: No State Income Tax

ADAM MICHAEL SOLINGER  
8500 HIGHLAND VIEW A  
LAS VEGAS NV 89145

Earnings	rate	other/hours	this period	year to date
Regular	5416.67		5,000.00	75,000.00
<b>Gross Pay</b>			<b>\$5,000.00</b>	<b>75,000.00</b>

### Important Notes

ADP TotalSource, Inc., A Professional Employer Organization  
10200 Sunset Drive, Miami, FL 33173  
1-800-554-1802

Deductions	Statutory	Other	this period	year to date
Federal Income Tax	-531.24			7,968.60
Social Security Tax	-310.00			4,650.00
Medicare Tax	-72.50			1,087.50
<b>Other</b>				
Adprs Roth	-350.00			5,250.00
<b>Net Pay</b>			<b>\$3,736.26</b>	
2Nd Checking	-3,736.26			33,626.34
Checking				18,681.30
<b>Net Check</b>			<b>\$0.00</b>	

BASIS OF PAY: NA

Your federal taxable wages this period are  
\$5,000.00

© 2002 ADP, INC.

**ADP TotalSource**  
A Professional Employer Organization  
5800 Windward Parkway  
Alpharetta, GA 30005

Advice number: 00000330015  
Pay date: 08/15/2019

Deposited to the account of	account number	transit	ABA	amount
ADAM MICHAEL SOLINGER	xxxxxxx9724	xxxx	xxxx	\$3,736.26

THIS IS NOT A CHECK

NON-NEGOTIABLE

000667

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	578
IHJ	100126	000100	XN50K	0000350016	1

LAS VEGAS DEFENSE GROUP  
2970 W. SAHARA AVENUE  
LAS VEGAS, NV 89102

## Earnings Statement



Period Beginning: 08/12/2019  
Period Ending: 08/26/2019  
Pay Date: 08/30/2019

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 3  
NV: No State Income Tax

ADAM MICHAEL SOLINGER  
8500 HIGHLAND VIEW A  
LAS VEGAS NV 89145

Earnings	rate	other/hours	this period	year to date
Regular	5416.67		5,000.00	80,000.00
<b>Gross Pay</b>			<b>\$5,000.00</b>	<b>80,000.00</b>

### Important Notes

ADP TotalSource, Inc., A Professional Employer Organization  
10200 Sunset Drive, Miami, FL 33173  
1-800-554-1802

Deductions	Statutory	Other	this period	year to date
Federal Income Tax			-531.24	8,499.84
Social Security Tax			-310.00	4,960.00
Medicare Tax			-72.50	1,160.00
<b>Other</b>				
Adprs Roth			-350.00	5,600.00
<b>Net Pay</b>			<b>\$3,736.26</b>	
2Nd Checking			-3,736.26	37,362.60
Checking				18,681.30
<b>Net Check</b>			<b>\$0.00</b>	

BASIS OF PAY: NA

Your federal taxable wages this period are  
\$5,000.00

© 2009 ADP, LLC

**ADP TotalSource**  
A Professional Employer Organization  
5800 Windward Parkway  
Alpharetta, GA 30005

Advice number: 00000350016  
Pay date: 08/30/2019

Deposited to the account of	account number	transit	ABA	amount
ADAM MICHAEL SOLINGER	xxxxxxxx9724	xxxx	xxxx	\$3,736.26

THIS IS NOT A CHECK

NON-NEGOTIABLE

000668

CO.	FILE	DEPT.	CLOCK	VCHR. NO.	576
IHJ	100126	000100	XN50K	0000370017	1

LAS VEGAS DEFENSE GROUP  
2970 W. SAHARA AVENUE  
LAS VEGAS, NV 89102

## Earnings Statement



Period Beginning: 08/27/2019  
Period Ending: 09/11/2019  
Pay Date: 09/13/2019

Taxable Marital Status: Married  
Exemptions/Allowances:  
Federal: 3  
NV: No State Income Tax

ADAM MICHAEL SOLINGER  
8500 HIGHLAND VIEW A  
LAS VEGAS NV 89145

Earnings	rate	other/hours	this period	year to date
Regular	5416.67		5,000.00	85,000.00
<b>Gross Pay</b>			<b>\$5,000.00</b>	<b>85,000.00</b>

### Important Notes

ADP TotalSource, Inc., A Professional Employer Organization  
10200 Sunset Drive, Miami, FL 33173  
1-800-554-1802

Deductions	Statutory		
	Federal Income Tax	-531.24	9,031.08
	Social Security Tax	-310.00	5,270.00
	Medicare Tax	-72.50	1,232.50
	<b>Other</b>		
	Adprs Roth	-350.00	5,950.00
	<b>Net Pay</b>	<b>\$3,736.26</b>	
	2Nd Checking	-3,736.26	41,098.86
	Checking		18,681.30
	<b>Net Check</b>	<b>\$0.00</b>	

BASIS OF PAY: NA

Your federal taxable wages this period are  
\$5,000.00

© 2000 ADP, LLC

**ADP TotalSource**  
A Professional Employer Organization  
5800 Windward Parkway  
Alpharetta, GA 30005

Advice number: 00000370017  
Pay date: 09/13/2019

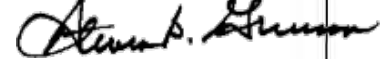
Deposited to the account of	account number	transit	ABA	amount
ADAM MICHAEL SOLINGER	xxxxxxxx9724	xxxx	xxxx	\$3,736.26

THIS IS NOT A CHECK

NON-NEGOTIABLE

000669





1 **NOTC**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

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

Dept No. **I**

Date of Hearing:

Time of Hearing:

**Oral Argument Requested: YES**

21 **RE-NOTICE OF HEARING**  
22 **FOR**

23 **DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF**  
24 **NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO**  
25 **EXTEND DISCOVERY DEADLINES (FIRST REQUEST)**

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

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

28 PLEASE TAKE NOTICE that a hearing on Defendant's Motion to Continue  
Trial, and for Issuance of New Trial Management Order, or in the Alternative to  
Extend Discovery Deadlines (First Request) will be held on the \_\_\_\_ day of \_\_\_\_

1 \_\_\_\_\_, 2019 at \_\_\_\_\_, \_\_\_\_\_.m. in Dept. I (courtroom 13) before the  
2 Eighth Judicial District Court – Family Division located at: The Family Courts and  
3 Services Center, 601 N. Pecos Road, Las Vegas, Nevada 89101.  
4

5 DATED this 30<sup>th</sup> day of September, 2019.  
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#14192

9 **Bruce I. Shapiro, Esq.**

Nevada Bar No. 4050

10 **Jack W. Fleeman Esq.**

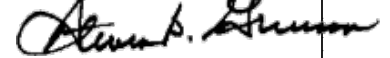
Nevada Bar No. 10584

11 8925 South Pecos Road, Suite 14A

12 Henderson, Nevada 89074

13 *Attorneys for Defendant*  
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1 **NOTC**

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

4 **Jack W. Fleeman, Esq.**  
5 Nevada Bar No. 010584

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

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

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

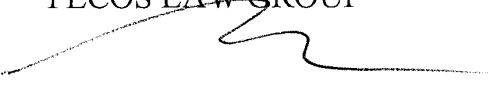
Dept No. **I**

21 **DEFENDANT'S NOTICE OF SEMINAR COMPLETION - EDCR 5.302**

22 Please take notice that Defendant, **Chalese Marie Solinger**, successfully  
23 completed the required course of study for separating parents on September 9,  
24 2019. A copy of the Certificate of Completion is attached.

25 DATED this 30 day of September 2019.

26 PECOS LAW GROUP


  

**Bruce I. Shapiro, Esq.**

Nevada Bar No. 004050  
8925 South Pecos Rd., Suite 14A  
Henderson, Nevada 89074  
Attorney for Defendant

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**Vincent Mayo, Esq.**  
THE ABRAMS & MAYO LAW FIRM  
VMGroup@TheAbramsLawFirm.com  
Attorney for Plaintiff

  
An employee of Pecos Law Group

THE CENTER FOR DIVORCE EDUCATION'S  
**CHILDREN IN BETWEEN®**

Online Parent Education for Divorcing Families

This certifies that

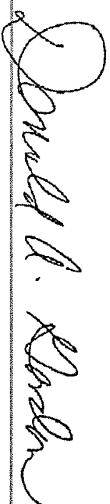
**Chalese Solinger**

has successfully completed the required 4 hour course of study on parent education for separating/divorcing families - including five quizzes and one final exam, with a cumulative score of 90% - requested by the

**Court of Clark County, Nevada**

and is therefore awarded this

**CERTIFICATE OF COMPLETION**



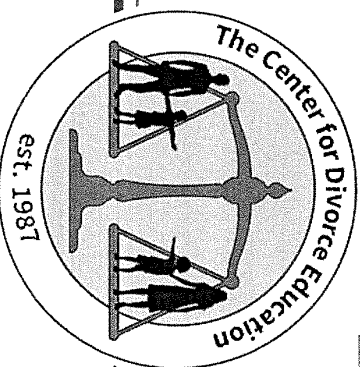
**Donald A. Gordon, Ph.D**

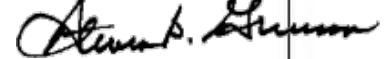
Executive Director

staff@divorce-education.com

1-877-874-1365

Course Start Date: 9/9/19





1 **EXMT**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

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

16 **Adam Michael Solinger,**

17 Plaintiff,

18 vs.

19 **Chalese Marie Solinger,**

20 Defendant.

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

Dept No. **I**

21 **EX PARTE MOTION FOR ORDER SHORTENING TIME**  
22 **TO HEAR DEFENDANT'S MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF**  
23 **NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND**  
24 **DISCOVERY DEADLINES (FIRST REQUEST)**

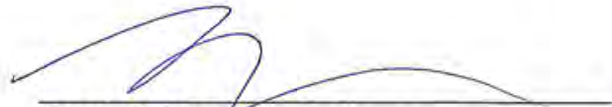
25 COME NOW Defendant, **Chalese Solinger** (hereinafter "**Chalese**"), by and  
26 through her attorneys of record, **Bruce I. Shapiro, Esq.** and **Jack W. Fleeman,**  
27 **Esq.**, of PECOS LAW GROUP, and pursuant to EDCR 5.513, hereby requests an Order  
28

1 Shortening Time for this Court to hear her Motion to Continue Trial, and for  
2 Issuance of New Trial Management Order, or in the Alternative to Extend  
3  
4 Discovery Deadlines (First Request).

5 This Ex Parte Motion is based upon the pleadings and papers on file herein,  
6  
7 the affidavit of counsel attached hereto, and is compliant with EDCR 5.513.

8 DATED this 30 day of September, 2019.

9  
10 PECOS LAW GROUP

11  
12 

13 **Bruce I. Shapiro, Esq.**

14 Nevada Bar No. 4050

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

16 Nevada Bar No. 10584

17 8925 S. Pecos Road, Suite 14A

18 Henderson, NV 89074

19 *Attorneys for Defendant*

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1 new issues, determined additional depositions were required and has been unable to  
2 complete the discovery process. Affiant requires an additional 60 days to complete  
3 discovery and be properly prepared for trial. Affiant also requests that the discovery  
4 deadlines be extended.  
5


6  
7 5. Affiant has attempted to communicate with opposing counsel and  
8 stipulate to a continuance based on the court's understanding and inclination to  
9 continue the trial if discovery could not be completed.  
10

11 6. Based on the foregoing, this Motion for an Order Shortening Time is  
12 made in good faith. Alternatively, the court may enter an order continuing trial  
13 without a hearing.  
14

15 FURTHER YOUR AFFIANT SAYETH NAUGHT.  
16

17  
18   
19 **Bruce I. Shapiro, Esq.**  
20

21  
22 This instrument was acknowledged before  
23 me this 30<sup>th</sup> day of September, 2019  
24 by Bruce I. Shapiro, Esq.

25   
26  
27 NOTARY PUBLIC in and for  
28 said County and State



*Steven D. Grierson*

1 **OST**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 **PECOS LAW GROUP**

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

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

16 **Adam Michael Solinger,**

17 **Plaintiff,**

18 **vs.**

19 **Chalese Marie Solinger,**

20 **Defendant.**

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

Dept No. **I**

10/03/2019  
1:30 p.m.

21 **ORDER SHORTENING TIME**

22  
23 Upon application of counsel for the Defendant, Bruce I. Shapiro, Esq, and  
24 Jack W. Fleeman, Esq., of PECOS LAW GROUP, and good cause appearing therefore:  
25

26 ...

27 ...

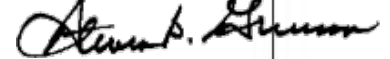


DATED this 1 day of Oct., 2019.

*[Signature]*  
DISTRICT COURT JUDGE

Respectfully Submitted by:  
PECOS LAW GROUP

**Bruce I. Shapiro, Esq.**  
Nevada Bar No. 4050  
**Jack W. Fleeman, Esq.**  
Nevada Bar No. 010584  
8925 S. Pecos Road, Suite 14A  
Henderson, NV 89074  
*Attorneys for Defendant*



1 **OPP**

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

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

14 ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
15 Plaintiff,	)	Department: I
	)	
16 vs.	)	
	)	Date of Hearing: October 3, 2019
17 CHALESE MARIE SOLINGER,	)	Time of Hearing: 1:30 p.m.
	)	
18 Defendant.	)	

19 **OPPOSITION TO DEFENDANT'S RENOTICED MOTION TO**  
20 **CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL**  
21 **MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO**  
22 **EXTEND DISCOVERY DEADLINES**

23 **NOW INTO COURT** comes Plaintiff, ADAM M. SOLINGER, by  
24 and through his attorney of record, Vincent Mayo, Esq., of The Abrams  
25 & Mayo Law Firm, and hereby submits his *OPPOSITION TO*  
26 *DEFENDANT'S RENOTICED MOTION TO CONTINUE TRIAL, AND*  
27 *FOR ISSUANCE OF NEW TRIAL MANAGEMENT ORDER, OR IN THE*  
28 *ALTERNATIVE TO EXTEND DISCOVERY DEADLINES.*

29 ///

1 This *Opposition* is made and based upon the attached Points and  
2 Authorities, the Affidavit of Plaintiff and Exhibit attached hereto, all  
3 papers and pleadings on file herein, and any oral argument adduced at  
4 the hearing of this matter.

5 Dated Wednesday, October 02, 2019.

6 Respectfully Submitted,

7 THE ABRAMS & MAYO LAW FIRM

8 /s/ Vincent Mayo, Esq.

Vincent Mayo, Esq.

9 Nevada State Bar Number: 8564

10 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Plaintiff

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 **I. PROCEDURAL NOTE**

13 Many of the preliminary facts relevant to this matter are set forth  
14 in Adam's original August 30, 2019 Opposition to Chalese's first request  
15 to continue trial. Adam therefore refers the Court to review the facts and  
16 arguments in said Opposition.

17 **II. OPPOSITION**

18 Chalese's second motion to continue has nothing to do with  
19 needing additional discovery and everything to do with seeking leverage.  
20 Chalese knows her custody and financial positions in this case are weak  
21

1 and she is not likely to prevail on them at trial. Therefore, Chalese's only  
2 hope is to force a settlement that is advantageous to her. She believes the  
3 way to do so is by continuing trial, thereby resulting in Adam settling.

4 The evidence of this is clear. Chalese sent Adam a text message on  
5 September 29<sup>th</sup> asking Adam to settle on 50/50 custody so she could  
6 avoid trial. Adam stated he could only agree to primary custody since  
7 based on the evidence, Adam believes said custody to be in the children's  
8 best interests. In response, Chalese re-noticed her motion to continue  
9 trial, claiming she "needs" additional discovery.

10 The truth, however, is that Chalese's request for additional  
11 discovery is duplicative. Chalese stated at the September 6<sup>th</sup> hearing that  
12 she "needed" to conduct some limited discovery, representing this would  
13 consist of a subpoena to Adam's work for employment records and a  
14 deposition of Adam. Chalese obtained both of these. Even after Adam's  
15 deposition, when Chalese had some additional questions for Adam  
16 regarding financial issues, Adam accommodated her request to provide  
17 answers via sworn statements in the form of an Affidavit. Hence, Chalese  
18 had the discovery she needed.<sup>1</sup>

19  
20 <sup>1</sup> Chalese's representation of what was said by Adam's counsel at the September 6<sup>th</sup>  
21 hearing is inaccurate. Mr. Mayo stated the goal was to keep the October 9<sup>th</sup> and 10<sup>th</sup>  
trial days and only if there were major issues regarding discovery would a  
continuance be addressed. Chalese's new and paltry discovery essentially asking the  
same questions Adam answered at his deposition do not qualify.

1 The discovery obtained by Chalese did not bolster her case though.  
2 The evidence still shows primary custody to Adam is in the children's  
3 best interests and an Offer of Judgment made by Adam supports Adam's  
4 requested financial relief. Chalese responded on September 29<sup>th</sup> by  
5 trying to get Adam to give in to her demands. ONLY AFTER Adam  
6 refused did Chalese re-notice her motion on September 30<sup>th</sup> to continue  
7 trial. She also cunningly propounded additional discovery<sup>2</sup> onto to Adam  
8 in an obvious attempt to make her request for a continuance seem  
9 authentic and necessary.

10 This additional discovery, however, is superfluous. In her new  
11 request for admissions, Chalese requests just three admissions:

12 (1) Chalese wants Adam to admit her summaries of his bank  
13 statements for a one-year period are accurate. Being that she is the one  
14 who created the summaries and has Adam's bank statements, this  
15 request seems unnecessary and foolish;

16 (2) Chalese wants Adam to admit the minor children refer to his  
17 significant other as "mother" or "mom" when Adam already testified  
18 during his deposition that they do not; and

19 (3) Chalese wants Adam to admit he has purchased alcohol  
20 while he has had the children but Adam's consumption of alcohol has

21 <sup>2</sup> Consisting of Requests for Admissions and Request for Interrogatories.

1 never been an issue. Regardless, and while Adam has purchased  
2 alcohol,<sup>3</sup> he has abided by the March 19, 2019 Order in this regard and  
3 not drank 24 hours prior to or during the time he has the children.

4 Chalese's Requests for Interrogatories are more of the same:

5 (1) Chalese again asks about the disposition of Adam's \$36,000  
6 share of the proceeds from the sale of the marital residence when Adam  
7 already answered this question during his deposition;

8 (2) Chalese asked Adam about any trips he has taken the  
9 children on over the last year. Chalese could have easily asked this  
10 during her deposition but simply choose not to do so;

11 (3) Chalese again asks about any gifts Adam has made over the  
12 last year when Adam already answered this question during his  
13 deposition;

14 (4) Chalese again asks about any significant other he has had  
15 over the last year when Adam already answered this question during his  
16 deposition;

17 (5) Chalese asks about whether Adam consumed alcohol when  
18 he has had the children since November 1, 2018. Chalese knows there  
19 was nor prohibition to either party doing so prior to the March 19<sup>th</sup> order

20 <sup>3</sup> Adam has already explained that since March 19, 2019, he has bought wine as a gift  
21 for his significant other's father; some wine for he and Jessica for a later date and  
then some right before Labor Day for a Labor Day get together. However, as Adam  
had the children at that time, he did not drink.



1 so as to the period after March 19<sup>th</sup>, Adam has already stated he has not;  
2 and

3 (6) Chalese asks if her summary (Request for Admission No. 1)  
4 is inaccurate. Again, Chalese has the bank records upon which she  
5 drafted her summary. Unless she cannot read, this question is a waste of  
6 time.

7 The Court will agree that Chalese's request to continue a trial that  
8 was **set over 8 months ago** over three meager admissions and six  
9 rudimentary interrogatories (that Adam has already answered and can  
10 answer again at trial) is not a good faith reason to continue trial. This  
11 discovery is nothing more than a blatant stall tactic and Chalese knows  
12 it.

13 This divorce needs to be completed. What's interesting is that even  
14 in her request to continue trial, Chalese continues to show the poor  
15 judgment detrimental to the minor children that in part resulted in the  
16 Court awarding Adam primary custody. Chalese states in her September  
17 29<sup>th</sup> text to Adam that the longer the custody case goes on, the more  
18 stressful it is for the children.<sup>4</sup> So what is Chalese's answer to this? – **to**  
19 **continue trial!** – something Chalese admits is not in the children's  
20 best interests.

---

21 <sup>4</sup> It should be pointed out that Chalese should not be talking to the young children  
about the divorce proceedings.

1 Unlike Chalese, Adam has taken this matter seriously and has  
2 already lined up witnesses who have rearranged their schedules and  
3 taken off time to be present at trial next week. Adam has also had to pay  
4 witness fees which will be forfeit if trial is continued. This is completely  
5 unfair and prejudicial to Adam in light of Chalese's scant, last second  
6 discovery.

7 At the very least, the Court should proceed with the custody  
8 portion of the trial next week. Chalese's requested discovery, while  
9 paltry, focuses on a few financial questions. It therefore makes no sense  
10 for the parties and the Court to lose two full days of trial when at least  
11 custody can be addressed. This would be consistent with Chalese's  
12 statements just a few days ago (presuming Chalese was being genuine in  
13 her statement) that the longer custody remains unresolved, the more  
14 stressful it is for the children. Therefore, Chalese's refusal to consider  
15 this option would speak volumes as to where her priorities lie and that  
16 she cannot place the children's interests ahead of her own.

17 Further, Chalese should remember that the Court at the March 19<sup>th</sup>  
18 hearing set Adam's family support at \$1,990.00 per month. This consists  
19 of \$1,848 in child support, with another \$142 tacked on by the Court for  
20 additional support. However, when custody was modified on June 17<sup>th</sup> to  
21 give Adam primary physical custody, the support order did not change.



1 Adam protested this but the Order remained but with the assurance of  
2 the Court that it would only be until trial this month. Now, Chalese  
3 wants to continue trial. Doing so would be completely unfair to Adam for  
4 a number of reasons, including the unlawful support order in place.  
5 Chalese needs to appreciate that any continuance would not only result  
6 in this Order being terminated, as it is contrary to the Court's prior  
7 representation and Nevada law, but Adam being entitled to child  
8 support from Chalese. Based on the numbers in her FDF, Chalese's  
9 support obligation would consist of \$325 per month for the two minor  
10 children.

11 **III. CONCLUSION**

12 Based on the foregoing, and in addition to this Honorable Court  
13 denying the relief in Chalese's Re-noticed Motion to Continue.

14 Dated Wednesday, October 02, 2019.

15 Respectfully Submitted,

16 THE ABRAMS & MAYO LAW FIRM

17 /s/ Vincent Mayo, Esq.

18 Vincent Mayo, Esq.

19 Nevada State Bar Number: 8564

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Attorney for Plaintiff

20 ///

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**AFFIDAVIT OF VINCENT MAYO, ESQ.**

STATE OF NEVADA    )  
                                  ) ss:  
COUNTY OF CLARK    )

1. I, VINCENT MAYO, do solemnly swear to testify herein to the truth, the whole truth and nothing but the truth.

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

3. I make this affidavit in support of the foregoing *OPPOSITION TO DEFENDANT'S RE-NOTICED MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY DEADLINES* and hereby certify that the facts set forth in the Points and Authorities attached thereto are true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true.

I incorporate said

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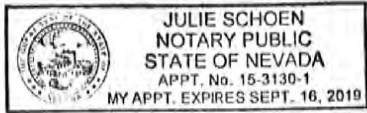
facts into this Affidavit as though fully set forth herein.

FURTHER, AFFIANT SAYETH NAUGHT.

VINCENT MAYO, ESQ.

SUBSCRIBED AND SWORN to before  
me this 2<sup>nd</sup> day of October, 2019.

  
NOTARY PUBLIC

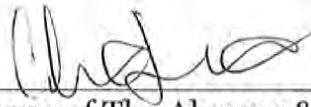


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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *OPPOSITION TO DEFENDANT'S RE-NOTICED MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST)* was filed electronically with the Eighth Judicial District Court in the above-entitled matter, on Wednesday, October 02, 2019. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

Bruce Shapiro, Esq.  
Attorney for Defendant



\_\_\_\_\_  
An Employee of The Abrams & Mayo Law Firm

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam M. Solinger  
Plaintiff/Petitioner

v.  
Chalese M. Solinger  
Defendant/Respondent

Case No. D-19-582245-D

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

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

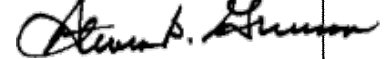
The total filing fee for the motion/opposition I am filing with this form is:

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

Party filing Motion/Opposition: Plaintiff/Petitioner Date 10/02/2019

Signature of Party or Preparer

*Julie Schen*



1 **RPLY**

2 **Bruce I. Shapiro, Esq.**

Nevada Bar No. 4050

3 **Jack W. Fleeman, Esq.**

Nevada Bar No. 10584

4 PECOS LAW GROUP

8925 South Pecos Road, Suite 14A

5 Henderson, Nevada 89074

6 Telephone: (702) 388-1851

Facsimile: (702) 388-7406

7 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

*Attorneys for Defendant*

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

10 **Adam Michael Solinger,**

11 Plaintiff,

12 vs.

14 **Chalese Marie Solinger,**

15 Defendant.

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

Dept No. **I**

16 **REPLY TO OPPOSITION TO DEFENDANT'S RENOTICED MOTION TO**  
17 **CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT**  
18 **ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY**  
19 **DEADLINES**


20 COMES NOW Defendant, **Chalese Marie Solinger**, by and through her  
21 attorneys of record, **Bruce I. Shapiro, Esq.**, and **Jack W. Fleeman, Esq.** of  
22 PECOS LAW GROUP and respectfully submits her REPLY TO OPPOSITION TO  
23 DEFENDANT'S RENOTICED MOTION TO CONTINUE TRIAL, AND FOR ISSUANCE OF  
24 NEW TRIAL MANAGEMENT ORDER, OR IN THE ALTERNATIVE TO EXTEND

1 DISCOVERY DEADLINES, and requests that this court enter orders granting her the  
2 relief requested in her motion.

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

6  
7 DATED this 2<sup>nd</sup> day of October, 2019.

8 PECOS LAW GROUP

9  #1192

10 **Bruce I. Shapiro, Esq.**

Nevada Bar No. 4050

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

Nevada Bar No. 10584

12 PECOS LAW GROUP

13 8925 South Pecos Road, Suite 14A

14 Henderson, Nevada 89074

*Attorneys for Defendant*

1 POINTS AND AUTHORITIES

2 **A. STATEMENT OF FACTS**

3  
4 Despite Adam's arguments, there have been substantial developments in  
5 this case since the parties were last before the court. The court will recall that at  
6 the time of the September 6, 2019 hearing, Mr. Shapiro represented to the court  
7 that he was not yet sure of what needed to be done, as he had not yet received the  
8 complete file from Mr. Schneider. The court was inclined to continue the trial, but  
9 Mr. Shapiro represented that he would work diligently and in good faith to attempt  
10 to avoid a continuance of the trial and the parties agreed to cooperate in expedited  
11 discovery.  
12

13 Adam, however, has not operated in good faith. Although Chalese was able  
14 to take Adam's deposition, Adam held back material disclosures and material  
15 witnesses until after his deposition. Chalese believes that Adam has been  
16 intentionally deceptive in his attempt to prevent Chalese from being able to  
17 present her case to the court. Since the hearing, the following has occurred, which  
18 necessitates a continuance:  
19

20 **1. Adam's New Disclosures**

21  
22 On September 30, 2019 around 3:30 p.m., Adam served his sixth set of  
23 NRCP 16.2 disclosures, producing an additional **368 pages** of documentation,  
24 including a private investigator's report, medical records for the children,  
25  
26



1 messages between the parties, and his mentioned affidavit. It is clear much of this  
2 evidence had existed for months before it was produced and Adam withheld much  
3 of this documentation until after his deposition to avoid being deposed about it.  
4 This last-minute disclosure of documents by Adam contains material evidence  
5 which Chalese should have had sooner and should have been able to use before  
6 she deposed Adam. Once it is certain that Adam has provided all of the  
7 documents he intends to use at trial, Chalese intends to resume Adam's deposition.  
8

9 More important, however, is the fact that *Adam added five new witnesses* to  
10 his witness list in this disclosure a mere eight days before trial. These witnesses  
11 include his father, a friend, and two private investigators hired by Adam. Adam  
12 served this disclosure less than a week before the close of discovery, leaving  
13 Chalese no time to depose any of Adam's new witnesses. Adam obviously  
14 intended to use these witnesses and intentionally only disclosed them eight days  
15 before trial so Chalese would not have the opportunity to depose them or properly  
16 prepare.  
17

## 18 **2. Adam's Father's Credit Card**

19 During his deposition, Adam testified he uses a credit card for various  
20 expenses for which his father pays the bill. This, however, was not disclosed on  
21 either of his Financial Disclosure Forms he filed. Through counsel, Adam stated  
22 he would disclose the statements for this credit card, but these documents were  
23  
24  
25  
26

1 never disclosed and are needed for trial. These statements are essential to show  
2 Adam's true income and the parties' standard of living.

3 **3. Deposing Jessica Sellers**  
4

5 Chalese wishes to depose Adam's girlfriend, Jessica Sellers. Despite the  
6 fact that Jessica is on Adam's witness list as "c/o Vincent Mayo, Esq.," Adam has  
7 not agreed to accept service to depose her, and Chalese has therefore been unable  
8 to take Ms. Seller's deposition. Considering that Adam is attempting to replace  
9 Chalese with Ms. Sellers and Ms. Sellers provides a significant amount of child  
10 care for the children during Adam's custodial time, Chalese believes deposing her  
11 is essential. Adam has made much of Chalese's new significant other during this  
12 litigation; Chalese should have the right to conduct her own investigation of  
13 Adam's girlfriend as well.  
14

15  
16 The court should also note that Adam has produced voluminous documents  
17 relating to his finances which were not previously disclosed that suggest Adam  
18 has been committing community waste by spending thousands of dollars on Ms.  
19 Sellers including gifts, travel and cash. Although working diligently and having  
20 multiple attorneys working on her case, Chalese has simply not had sufficient time  
21 to fully analyze Adam's waste.  
22

23 **4. Electronic Device Analysis**  
24

25 As this court knows, Chalese's former counsel made some statements about  
26 analyzing Adam's electronic devices for possible illegal content. These devices

1 are with an expert, but the analysis is not yet complete. This analysis may be  
2 relevant to the custody proceedings.

3 **5. Adam's Un-Served Trial Subpoenas**  
4

5 Adam has been serving witnesses with trial subpoenas without serving  
6 those subpoenas to Chalese. So far, Adam has filed trial subpoenas for three  
7 witnesses. Additionally, upon information and belief, Chalese's boyfriend's ex-  
8 girlfriend, Carmen Disavio-Watson, was served with a trial subpoena as well. The  
9 subpoena to Ms. Disavio-Watson does not appear to be filed and was never served  
10 to Chalese's counsel. Additionally, Ms. Disavio-Watson was never listed by  
11 Adam as a witness. It appears Adam planned to have Ms. Disavio-Watson appear  
12 as some sort of "surprise witness." This is obviously underhanded and was  
13 possibly done to prevent Chalese from preparing a rebuttal to any of Ms. Disavio-  
14 Watson's possible testimony.  
15

16 **6. Adam's Custody Diary**  
17

18 During Adam's deposition he disclosed that he was keeping a "custody  
19 diary." Adam agreed to produce this diary but has not.  
20

21 **7. Adam's Retirement Account**

22 Through discovery, Adam provided statements for a 401(k) through his  
23 employer. Through pay summaries obtained through Adam's employer, it shows  
24 deductions for "ADPRS ROTH" and also provides for employer benefits for  
25

1 “ADP 401K HOURS” and “ER MATCH.” Then, in Adam’s Offer of Judgment, it  
2 references a Roth IRA. At this point, it is unclear whether Adam has an IRA, a  
3 401(k), or both. This is obviously an issue on which Chalese will need to conduct  
4 discovery.  
5

6 Although Chalese did have the opportunity to take Adam’s deposition, she  
7 did not have all of the relevant information to take a complete deposition. More  
8 important, Adam had intentionally withheld witnesses and evidence until after his  
9 deposition so that he could not be deposed on this information. Adam has been  
10 deceptive and through his conduct has provided further reason for this trial to be  
11 continued.  
12

### 13 **B. LEGAL ARGUMENT**

14 EDCR 7.30(a) states that a continuance of trial may be sought for good  
15 cause. Though Adam stated he was prepared for trial at the September 6, 2019  
16 hearing, Adam intentionally held back witnesses and evidence until after Adam  
17 was deposed and until it was too late for Chalese to conduct any further discovery  
18 on the written evidence or depose his new witnesses. Chalese also believes Adam  
19 conspired with his employer to avoid producing subpoenaed documents until after  
20 Adam was deposed.  
21

22 Adam has been uncooperative, deceptive, and has attempted to “sandbag”  
23 evidence, witnesses, and exhibits. Adam has also withheld important evidence  
24 (and documents required by NRCP 16.2) despite promising to produce them,  
25  
26

1 including the statements for the credit card Adam uses that is paid by his father.

2 There is no doubt trial must be continued.

3       Although there are issues related to the parties' finances that require this  
4 matter to be continued, custody is the most important issue to Chalese, and she is  
5 simply not prepared to present her case. The court temporarily changed custody  
6 from joint to giving Adam primary. Chalese does not believe it is in the children's  
7 best interests for Adam to have primary physical custody, especially after  
8 testifying in his deposition that he believes it is better for the children to be with  
9 his girlfriend than Chalese. As the court was inclined to do at the September 6,  
10 2019 hearing, this trial should be continued 90 days.

13       Adam's allegations that Chalese seeks this continuance for leverage is silly  
14 and there is no prejudice to Adam. Adam currently has temporary primary  
15 custody and the only reason he opposes continuing trial is because he knows that  
16 he has caused Chalese significant disadvantage by withholding evidence and  
17 witnesses and knows if the trial is not continued the court will not hear a fair  
18 representation of the evidence. The court must make a decision based upon the  
19 best interests of the children and therefore should have all relevant evidence  
20 necessary to make that decision.

23       Adam also claims that he will be prejudiced because he is under a  
24 temporary financial order that he believes is excessive. This is also a silly  
25 argument in that Chalese believes that once the court hears all of the evidence of

1 Adam's financial resources it will significantly increase its support order. Adam's  
2 objection to paying his wife less than \$2,000.00 in support should be taken in the  
3 context that Adam receives approximately \$5,000.00 per month in cash from his  
4 father, lives in a home owned by his father with subsidized rent, and has spent  
5 thousands of dollars per month on gifts, travel and cash on his new girlfriend.  
6

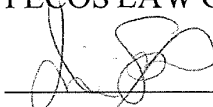
7 Continuing trial, including the custody portion, is not prejudicial to Adam.  
8 He has temporary primary physical custody, which Chalese expects will go back  
9 to joint once she has the opportunity to present all of her relevant evidence.  
10 Chalese cannot properly present her case for returning to joint physical custody  
11 without being able to complete discovery and properly prepare her case.  
12

13 **I. CONCLUSION**

14 WHEREFORE, based on the foregoing, Defendant, **Chalese Marie**  
15 **Solinger**, respectfully requests that this court continue the trial in this matter.  
16

17 DATED this 2<sup>nd</sup> day of October, 2019.

18 PECOS LAW GROUP

19  10/11/19

20 **Bruce I. Shapiro, Esq.**

Nevada Bar No. 4050

21 **Jack W. Fleeman, Esq.**

Nevada Bar No. 10584

22 PECOS LAW GROUP

23 8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

24 *Attorneys for Defendant*

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of PECOS LAW  
3 GROUP, and that on this 2<sup>nd</sup> day of October, 2019, I served a copy of  
4 REPLY TO OPPOSITION TO DEFENDANT'S RENOTICED MOTIO TO  
5 CONTINUE TRIAL, AND FOR ISSUANCE OF NEW TRIAL MANAGEMENT  
6 ORDER, OR IN THE ALTERNATIVE TO EXTEND DISCOVERY  
7 DEADLINES as follows:

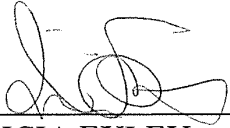
8 ☐ By placing same to be deposited for mailing in the United States Mail,  
9 in a sealed envelope upon which first class postage was prepaid in Las Vegas,  
10 Nevada: and/or

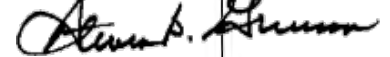
11 ☒ Pursuant to NEFCR 9, by mandatory electronic service through the  
12 Eighth Judicial District Court's electronic filing system: and/or

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

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

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

23   
24 \_\_\_\_\_  
25 ALICIA EXLEY  
26 An employee of PECOS LAW GROUP



**ORDR**

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

ADAM MICHAEL SOLINGER,	)	Case No.: D-19-582245-D
	)	
Plaintiff,	)	Department: I
vs.	)	
	)	Date of Hearing: August 1, 2019
CHALESE MARIE SOLINGER,	)	Time of Hearing: 10:00 a.m.
	)	
Defendant.	)	

**ORDER AFTER HEARING OF AUGUST 1, 2019**

This matter coming on for hearing on the on the 1<sup>st</sup> day of August 2019, before the Honorable Cheryl B. Moss, upon Defendant's *Motion for an Order to Show Cause re: Hold Plaintiff in Contempt for Failing to Allow Defendant's Visitation with the Minor Child the Defendant's Court Hearing Held of March 12<sup>th</sup>, 2018 Violation of Court Orders; Defendant Should be Awarded Attorney's Fees and Costs for Having to File this Motion for an Order to Show Cause, and Plaintiff's Opposition to Motion for an Order to Show Cause re: Hold Plaintiff in Contempt*



1 *for Failing to Allow Defendant's Visitation with the Minor Child the*  
2 *Defendant's Court Hearing Held of March 12<sup>th</sup>, 2018 Violation of Court*  
3 *Orders; Defendant Should be Awarded Attorney's Fees and Costs for*  
4 *Having to File this Motion for an Order to Show Cause and*  
5 *Countermotion for Attorney's Fees and Costs with Plaintiff, ADAM*  
6 *MICHAEL SOLINGER (hereinafter referred to as "Adam"), having*  
7 *appeared personally and by and through his attorney of record,*  
8 *VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM, and*  
9 *Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as*  
10 *"Chalese"), having appeared personally and by and through her attorney*  
11 *of record, LOUIS C. SCHNEIDER, ESQ., or LAW OFFICE OF LOUIS C.*  
12 *SCHNEIDER and the Court having listened to the representations and*  
13 *arguments of counsel, and good cause appearing:*

14 **IT IS HEREBY NOTED** that Attorney Schneider represented he  
15 filed an Order Shortening Time on Chalese's Motion to purchase a  
16 house.

17 **IT IS FURTHER NOTED** that Attorney Schneider represents an  
18 intern in his office prepared the *Motion for an Order to Show Cause re:*  
19 *Hold Plaintiff in Contempt for Failing to Allow Defendant's Visitation*  
20 *with the Minor Child the Defendant's Court Hearing Held of March 12<sup>th</sup>,*  
21 *2018 Violation of Court Orders; Defendant Should be Awarded*

1 *Attorney's Fees and Costs for Having to File this Motion for an Order to*  
2 *Show Cause and it slipped by him.*

3 **THE COURT HEREBY FINDS** that Chalese's *Motion for an*  
4 *Order to Show Cause re: Hold Plaintiff in Contempt for Failing to*  
5 *Allow Defendant's Visitation with the Minor Child the Defendant's*  
6 *Court Hearing Held of March 12<sup>th</sup>, 2018 Violation of Court Orders;*  
7 *Defendant Should be Awarded Attorney's Fees and Costs for Having to*  
8 *File this Motion for an Order to Show Cause* is deficit.

9 **IT IS HEREBY ORDERED** that Chalese's Motion for Order to  
10 Show Cause filed on June 13, 2019 shall be stricken. There must be merit  
11 for the Order to Show Cause, if there is no merit, Chalese shall drop the  
12 claim.

13 **IT IS FURTHER ORDERED** that Attorney Schneider shall  
14 refile a Motion for Order to Show Cause with a specific Affidavit and  
15 specific pleadings of allegations with reference to the temporary orders.  
16 The Court grants the Order to Show Cause to be heard at trial on  
17 October 9, 2019 at 9:00 a.m.

18 The matter was trailed for discussion regarding Chalese's request  
19 for funds in the amount of \$50,000.00 toward a down payment on a  
20 new residence. The matter was recalled, and Attorney Schneider agreed  
21 to take the matter off calendar regarding the house proceeds.

1       **IT IS HEREBY NOTED** that there is approximately  
2 \$168,000.00 from the sale of the proceeds and \$96,000.00 is contested.  
3 There is an estimated \$72,000.00 left which shall be divided between  
4 the parties and each party shall receive \$36,000.00. Chalese is  
5 requesting an additional \$14,000 at this time based on her  
6 representation that she needs \$50,000 as and for a down payment on a  
7 home she wishes to buy. As Adam has a 401K with approximately  
8 \$28,000.00, \$14,000.00 of which would be Chalese's community  
9 property, an additional advance of \$14,000 would be secured as against  
10 Chalese's interest in the 401k. Chalese, however, is to provide  
11 documentation evidencing the need for the \$50,000.

12       **IT IS FURTHER ORDERED** that Attorney Mayo shall transfer  
13 \$50,000.00 to Attorney Schneider's trust account for distribution to  
14 Chalese in accordance with the terms above.

15       **IT IS FURTHER ORDERED** that Adam shall also receive full  
16 discovery on the documents from the purchase of Chalese's new  
17 residence. This Court wants full transparency on the loan and escrow  
18 documents. The check for \$50,000 shall be cut when the documents are  
19 provided to Adam showing it is \$50,000.

20       **IT IS FURTHER ORDERED** that Attorney Schneider's request  
21 for attorney's fees is deferred per Attorney Schneider's agreement.

1       **IT IS FURTHER ORDERED** that Calendar Call currently set for  
2 September 9, 2019 at 9:00 a.m. is vacated.

3       **IT IS FURTHER ORDERED** that Evidentiary Hearing (Stack 1)  
4 - Day 1 set for October 9, 2019 at 9:00 a.m. and Day 2 set for October 10,  
5 2019 at 9:00 a.m. stands.


6       **IT IS FURTHER ORDERED** that Attorney Mayo shall prepare  
7 the Stipulation and Order; Attorney Schneider shall review and  
8 countersign.

9       **IT IS FURTHER ORDERED** that Attorney Mayo shall prepare  
10 the Order from today's hearing; Attorney Schneider shall review and  
11 countersign.

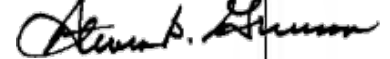
12 Dated this       OCT 01 2019       day of                     , 2019.

13  
14 Respectfully Submitted:  
15 THE ABRAMS & MAYO LAW  
16 FIRM

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

  
DISTRICT COURT JUDGE  
Approved as to form and content:  
LAW OFFICE OF LOUIS C.  
SCHNEIDER

  
Louis C. Schneider, Esq.  
Nevada State Bar Number: 9683  
430 South Seventh Street  
Las Vegas, Nevada 89101  
Tel: (702) 435-2121  
Fax: (702) 431-3807  
Attorney for Defendant



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

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

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

16 **NOTICE OF ENTRY OF ORDER AFTER HEARING OF**

17 **AUGUST 1, 2019**

18 PLEASE TAKE NOTICE that the Order After Hearing of August 1,  
19 2019 was duly entered in the above-referenced matter. A true and correct  
20 copy of said  
21

22 ///

23 ///

24 ///

1 Order is attached hereto.

2 DATED Friday, October 04, 2019.

3

Respectfully Submitted,

4

THE ABRAMS & MAYO LAW FIRM

5

6

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

7

Vincent Mayo, Esq.

8

Nevada State Bar Number: 8564

9

6252 South Rainbow Blvd., Suite 100

10

Las Vegas, Nevada 89118

11

Attorney for Plaintiff

12

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And Louis C. Schneider, Esq.  
Bruce I. Shapiro, Esq.

10  
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24



**ORDR**

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

Eighth Judicial District Court  
Family Division  
Clark County, Nevada

ADAM MICHAEL SOLINGER, ) Case No.: D-19-582245-D

Plaintiff,

vs.

CHALESE MARIE SOLINGER,

Defendant.

) Department: I

) Date of Hearing: August 1, 2019

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

**ORDER AFTER HEARING OF AUGUST 1, 2019**

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*to Allow Defendant's Visitation with the Minor Child the Defendant's*  
*Court Hearing Held of March 12<sup>th</sup>, 2018 Violation of Court Orders;*  
*Defendant Should be Awarded Attorney's Fees and Costs for Having to*  
*File this Motion for an Order to Show Cause, and Plaintiff's Opposition*  
*to Motion for an Order to Show Cause re: Hold Plaintiff in Contempt*



1 *for Failing to Allow Defendant's Visitation with the Minor Child the*  
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4 *Having to File this Motion for an Order to Show Cause and*  
5 *Countermotion for Attorney's Fees and Costs with Plaintiff, ADAM*  
6 *MICHAEL SOLINGER (hereinafter referred to as "Adam"), having*  
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8 *VINCENT MAYO, ESQ., of THE ABRAMS & MAYO LAW FIRM, and*  
9 *Defendant, CHALESE MARIE SOLINGER (hereinafter referred to as*  
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11 *of record, LOUIS C. SCHNEIDER, ESQ., or LAW OFFICE OF LOUIS C.*  
12 *SCHNEIDER and the Court having listened to the representations and*  
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1 *Attorney's Fees and Costs for Having to File this Motion for an Order to*  
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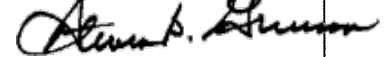
12 Dated this \_\_\_\_ day of OCT 01 2019, 2019.

13  
14 Respectfully Submitted:  
15 **THE ABRAMS & MAYO LAW**  
16 **FIRM**

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

  
DISTRICT COURT JUDGE  
Approved as to form and content:  
LAW OFFICE OF LOUIS C.  
SCHNEIDER

  
Louis C. Schneider, Esq.  
Nevada State Bar Number: 9683  
430 South Seventh Street  
Las Vegas, Nevada 89101  
Tel: (702) 435-2121  
Fax: (702) 431-3807  
Attorney for Defendant



1 **MOT**

2 **Bruce I. Shapiro, Esq.**

3 Nevada Bar No. 004050

4 **Jack W. Fleeman, Esq.**

5 Nevada Bar No. 010584

6 PECOS LAW GROUP

7 8925 South Pecos Road, Suite 14A

8 Henderson, Nevada 89074

9 Telephone: (702) 388-1851

10 Facsimile: (702) 388-7406

11 Email: [Bruce@pecoslawgroup.com](mailto:Bruce@pecoslawgroup.com)

12 *Attorneys for Defendant*

13 **DISTRICT COURT**  
14 **CLARK COUNTY, NEVADA**

15 **Adam Michael Solinger,**

16 Plaintiff,

17 vs.

18 **Chalese Marie Solinger,**

19 Defendant.

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

Dept No. **I**

20 **DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL SUPPORT AND**  
21 **PRELIMINARY ATTORNEY'S FEES**

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

- 25 1. Granting Defendant temporary spousal support pending trial;
- 26 2. Granting Defendant an award of attorney's fees pursuant to *Sargeant*

*v. Sargeant*; and

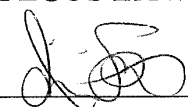
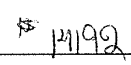
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3. For other and further relief as the Court deems proper.

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

DATED this 9<sup>th</sup> day of October, 2019.

PECOS LAW GROUP

  10/9/19

**Bruce I. Shapiro, Esq.**

Nevada Bar No. 004050

**Jack W. Fleeman, Esq.**

Nevada Bar No. 010584

PECOS LAW GROUP

8925 South Pecos Road, Suite 14A

Henderson, Nevada 89074

*Attorneys for Defendant*

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

3                    At the hearing on October 3, 2019, counsel for Plaintiff argued that all  
4 support from Plaintiff to Defendant should cease because Plaintiff has temporary  
5 primary physical custody of the children. Defendant's counsel informed the court  
6 that he would file a motion for temporary spousal support, and this motion  
7 follows.

8                    **POINTS AND AUTHORITIES**

9                    **I. FACTS**

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

14                   Adam is an attorney in Las Vegas, employed with Las Vegas Defense  
15 Group. He receives a salary of \$120,000.00 per year, plus bonuses of  
16 approximately \$3,000.00 per year, for monthly wages of \$10,250.00.  
17

18                   In July 2019, Adam's parents purchased a home for him to live in. It is a  
19 3,811 square foot, \$650,000.00 home. Adam claims he pays his parents rent of  
20 \$1,500.00 per month. It appears, however, that similar properties in Las Vegas  
21 rent for approximately \$6,500.00 per month, meaning Adam's father is  
22 subsidizing his rent by approximately \$5,000.00 per month. In addition to  
23  
24

1 subsidizing his rent, Adam's father also gives him full access to a credit card paid  
2 by Adam's father, as well as gives him cash of, on average, \$5,000.00 per month.

3 Through most of the parties' marriage, Chalese was a homemaker and  
4 worked only sporadically, never earning more than \$20,000.00 per year. Since the  
5 parties' separation, Chalese has found employment cutting children's hair. Her  
6 gross monthly income is \$1,442.43.

7  
8 Per Chalese's financial disclosure form, her monthly expenses total  
9 \$2,480.91.<sup>1</sup> These expenses do not represent Chalese's reasonable needs or the  
10 lifestyle she enjoyed before Adam filed for divorce, they merely reflect what she  
11 has available to spend. Chalese has had to drastically reduce her expenses after  
12 the parties' separation for the simple reason she did not have sufficient income to  
13 maintain the pre-separation lifestyle. After the marital home was sold, Chalese  
14 used a portion of the proceeds to purchase a new home. Her monthly mortgage is  
15 only \$1,153.91 per month – far less than she would pay in rent for a similarly-  
16 sized home, and less than Adam pays his parents for rent. Adam's lifestyle,  
17 however, has not change one bit.

18  
19 Adam was previously paying family support to Chalese of \$1,330.00 per  
20 month. Since Adam has temporary primary physical custody of the children, the  
21 court on October 3, 2019 eliminated this support requirement. Chalese, through  
22

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23 <sup>1</sup> Not including Chalese's car insurance. Chalese's mother currently pays her car  
24 insurance but is unable to afford to do so much longer.



1 counsel, advised the court and Adam that she believed the elimination of this  
2 support was not equitable, but would file a motion to address financial issues  
3 pending trial.

4 The parties are still married, at least \$10,000.00 of Adam's income is  
5 community and Adam still has an obligation and ability to help support his wife.  
6 There is an \$8,807.57-per-month disparity in the parties' work incomes, and  
7 Adam receives significant additional support from his father every month (as the  
8 parties have received for years). Adam is spending thousands of dollars per month  
9 on his girlfriend through gifts, travel and cash. Adam can afford to help support  
10 his wife, he simply chooses not to. *Chalese has the need and Adam has the*  
11 *ability to pay temporary spousal support.*  
12

13 Additionally, it was discovered during Adam's deposition that his father has  
14 also been paying his attorney's fees. To date, Adam's father has gifted him over  
15 \$40,000.00 for his attorney's fees and at least \$10,000.00 to hire a private  
16 investigator. In contrast, Chalese has had to take a loan out from her mother to pay  
17 her own fees. Chalese's mother can no longer afford to finance this litigation, and  
18 she should not have to do so. Adam has more than enough discretionary income to  
19 pay preliminary fees and Chalese must be put on an equal footing.  
20

## 21 **II. LEGAL ARGUMENT**

### 22 **A. DEFENDANT SHOULD BE AWARDED TEMPORARY SPOUSAL** 23 **SUPPORT.**

24

1 The Court has the authority to order a spouse to pay money to another  
2 spouse during the pendency of a divorce action in order “[t]o provide temporary  
3 maintenance for the other party” pursuant to NRS 125.040. All property acquired  
4 and income earned during marriage is community property. *Forrest v. Forrest*, 99  
5 Nev. 602, 668 P.2d 275 (1983). “Except as provided by statute...separation of the  
6 parties does not dissolve the community and does not alter the character of the  
7 parties’ income during the period of separation.” *Hybarger v. Hybarger*, 103 Nev.  
8 255, 258 n. 5, 737 P.2d 889, 891 n. 5 (1987) (citing *Forrest*, 99 Nev. at 602, 668  
9 P.2d at 275).

10  
11  
12 **1. Adam’s Income**

13 In addition to his wages from employment of \$10,250.00 per month, Adam  
14 admitted in his deposition that he receives at least \$5,000.00 per month in cash  
15 from his father, subsidized rent, and a credit card which his father pays off every  
16 month. At least an additional \$5,000.00 per month in income should be imputed to  
17 Adam due to these gifts, which began years ago.

18  
19 “Income may be imputed based on gifts if the gifts are continuing and  
20 ongoing, not sporadic, and where the evidence shows that the gifts will continue in  
21 the future.” *Carlson v. Carlson*, 204 So.3d 456, 457 (Fla. 4th DCA 2016) (internal  
22 citations and quotation marks omitted). Here, the gifts are clearly continuing and  
23 ongoing.  
24

1           In *In re Marriage of Alter*, 171 Cal.App.4th 718, 89 Cal.Rptr.3d 849 (2009),  
2 a father's mother covered many of his expenses, including giving him a \$3,000.00  
3 monthly stipend. *Id.* at 724, 854. The father argued the money was a loan. *Id.* at  
4 731, 850. The trial court did not agree and characterized the money as a gift, and  
5 characterized the gift as income. *Id.* On appeal, the appellate court pointed out that  
6 the child support guidelines are based on a parent's "actual income, not their  
7 taxable income." *Id.* at 735, 862. The appellate court concluded that "nothing in  
8 the law prohibits considering gifts to be income for purposes of child support so  
9 long as the gifts bear a reasonable relationship to the traditional meaning of  
10 income as a recurrent monetary benefit." *Id.* at 737, 863. Here, Adam has  
11 conceded that the \$5,000.00 per month cash, plus other monthly benefits he  
12 receives from his father, are gifts and not loans.

15           Cash gifts, however, are not the only gifts considered income by courts. In  
16 *Petrini v. Petrini*, 336 Md. 453, 648 A.2d 1016 (1994), a father's mother allowed  
17 him to reside in one of her homes rent-free and paid the child's health insurance  
18 premiums, the value of which the court found attributed to the father's income.  
19 The district court's finding was affirmed on appeal.

21           In *Mellen v. Mellen*, 260 A.D.2d 609, 688 N.Y.S.2d 674 (2d Dep't 1999),  
22 the appellate court confirmed that the trial court properly included money which a  
23 father received from his parents as income. In *State v. Williams*, 635 S.E.2d 495  
24

1 (N.C. Ct. App. 2006), a mother testified that her father gave a friend money to pay  
2 the rent on the home in which she resided, and that it was her understanding her  
3 father would continue to do so. *Id.* at 498. She also testified the vehicle she used  
4 was also paid for by her father in the same manner. *Id.* The trial court did not  
5 include this in the mother's income, which the appellate court found to be in error.  
6  
7 *Id.*

8 Other states have found that regular, continuous gifts count as income as  
9 well. *See e.g., Ordini v. Ordini*, Fla.App. 4, 701 So.2d 663, 664, (1997) (gifts from  
10 Dad's parents who supported the couple during marriage are income); *Barnier v.*  
11 *Wells*, 476 N.W.2d 795, 797 (Minn.Ct.App. 1991) (regular gifts from a  
12 dependable party can be considered income); *In re Marriage of Rogers*, 213 Ill.2d  
13 129, 820 N.E.2d 386 (2004) (Gifts and loans to Dad from his family were income  
14 because he had received them every year for his entire adult life); *State ex rel.*  
15 *Sells v. Sells*, 669 N.W.2d 260 (Iowa App. 2003) (gifts of money provided to Dad  
16 monthly by his father were "significant additions to his financial picture" and  
17 could be considered by the court for a deviation from the child support  
18 guidelines); *Stewart v. Burton*, 108 S.W.2d 647 (Ky. 2003) (payments to Dad  
19 from his parents for rent and a vehicle were part of his gross income).

22 If the court considers Adam's salary of \$10,500.00 per month, his  
23 subsidized rent of \$5,000.00 per month, cash from his father of at least \$5,000.00  
24

1 per month, plus an unknown in-kind income Adam receives from his father,  
2 *Adam's monthly income is at least \$15,250.00 monthly*, compared to Chalese's  
3 \$1,442.43. This disparity of income mandates a temporary spousal support award.  
4

5 This court should award Chalese no less than \$2,500.00 in temporary  
6 support. This represents only 16% of Adam's total monthly income and would  
7 still give Adam \$12,750.00 per month compared to Chalese still only receiving  
8 \$3,942.43 per month.

9 **2. Marital Waste**

10 Since the separation, Adam has spent a significant amount of money on his  
11 girlfriend.<sup>2</sup> He took her to Colorado in December, Universal Studios for New  
12 Year's, Santa Barbara in January, Hawaii in April, and Disneyland in May. He  
13 also purchased \$800.00 worth of jewelry for his girlfriend for Christmas, and an  
14 additional \$1,675.27 worth of jewelry for his girlfriend in June 2019. The total  
15 spent by Adam from his personal bank account and credit card on these trips with  
16 and gifts for his new girlfriend total nearly \$10,000.00.  
17  
18

19 In addition to paid trips and gifts, Adam also transferred \$9,110.00 in cash  
20 to his girlfriend from March through June 2019, which is an average of \$2,277.50  
21 monthly. Just these cash transfers average nearly \$1,000.00 more per month than  
22

23  
24 <sup>2</sup> See Spreadsheets analyzing Adam's bank accounts and credit cards in Defendant's  
Exhibit Addendum ("DEA") at bates stamp nos. ("BS") DEF000268-DEF000321.

1 Adam was paying Chalese in family support. If Adam has the money to spend  
2 almost \$20,000.00 on his new girlfriend over the last ten months, he has the  
3 income and ability to pay spousal support to his wife.  
4

5 **B. DEFENDANT SHOULD BE AWARDED PRELIMINARY**  
6 **ATTORNEY'S FEES.**

7 As stated, with the monthly contributions from his father, Adam earns  
8 nearly ten times as much as Chalese, and his father has been solely funding his  
9 portion of this litigation, providing Adam with over \$50,000.00 for attorney's  
10 fees. Chalese does not have the luxury of a well-paying job or wealthy parents.  
11 She has been forced to borrow money from her mother for fees, but her mother  
12 cannot afford to continue lending money. Further, not only is Adam the financially  
13 advantaged spouse with the added advantage of having a father who is willing to  
14 pay the entirety of his fees, but Adam has the added benefit of being an attorney,  
15 putting Chalese at further disadvantage. The community has plenty of income to  
16 pay Chalese's attorney's fees, and she should be awarded attorney's fees so she  
17 can continue this litigation on equal footing with Adam.  
18

19 As of October 1, 2019, Chalese owes her attorney \$27,885.75.<sup>3</sup> She  
20 estimates she will need the following sums to get her through trial:  
21

- 22 1. Additional depositions and transcripts: \$5,000.00;  
23

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24 <sup>3</sup> See Billing Statements in DEA at BS DEF000322-DEF000334.

2. Trial preparation: \$10,000.00;
3. Trial (three days): \$12,000.00;
4. Other misc. fees/costs: \$3,000.00.

Chalese therefore requests an award of \$57,885.75 in fees for trial. Chalese asks that the court keep in mind that this requested award is only slightly more than Adam has already spent so far during this litigation. The court should also consider that Chalese's income and resources after divorce will never be close to Adam's and she should not have to use her limited assets to pay her litigation costs.

A financially disadvantaged party "must be afforded her day in court without destroying her financial position" and should not be forced to "liquidate her savings and jeopardize the child's and her future subsistence still without gaining parity with her husband." *Sargeant v. Sargeant*, 88 Nev. 223, 227, 495 P.2d 618, 621 (1972).

Awards of attorney's fees are within the sound discretion of the district court. *Fletcher v. Fletcher*, 89 Nev. 540, 516 P.2d 103 (1973); *Levy v. Levy*, 96 Nev. 902, 620 P.2d 860 (1980); *Hybarger v. Hybarger*, 103 Nev. 255, 737 P.2d 889 (1987). When considering whether to award attorney's fees, the Court must evaluate the legal basis for such fees and also the factors outlined in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), which are as follows:

1 (1) The qualities of the advocate: his ability, his training, education,  
2 experience, professional standing and skill; (2) the character of the  
3 work to be done: its difficulty, its intricacy, its importance, time and  
4 skill required, the responsibility imposed and the prominence and  
5 character of the parties where they affect the importance of the  
6 litigation; (3) the work actually performed by the lawyer: the skill,  
7 time and attention given to the work; (4) the result: whether the  
8 attorney was successful and what benefits were derived.

9 Each factor should be given consideration, and no one element should be  
10 given undue weight or predominate. *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d  
11 727 (2005). The Court should also consider any disparity in income between the  
12 parties when awarding fees. *Id.* at 623, 730 (citing *Wright v. Osburn*, 114 Nev.  
13 1367, 970 P.2d 1071 (1998)).

14 With respect to the *Brunzell* factors, Counsel in this case are well-qualified  
15 and members in good standing of the State Bar. Mr. Shapiro has been practicing  
16 law for more than 28 years, primarily in the field of family law since 1990. Mr.  
17 Fleeman has been practicing family law for approximately 10 years and is a  
18 certified family law specialist. This motion is critical to the resolution of the issues  
19 raised in this matter. Further, a good deal of time and skill that is particular to  
20 family law cases has been required to ensure the fact present a comprehensive  
21 picture of the outstanding issues. The undersigned counsel, in working on this  
22 case, diligently checked facts and reviewed the law. Counsel has, through  
23 application of law to facts, striven to present a concise and logical picture of  
24 where these parties are and what we believe is the appropriate conclusion for the



1 court to reach. A sample of the effort expended, in the form of the client's  
2 monthly statements, redacted as to confidential information, will be supplied to  
3 the court upon request.  
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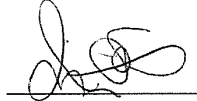

### 5 **III. CONCLUSION**

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

- 8 1. Granting Defendant temporary spousal support pending trial;
- 9 2. Granting Defendant an award of attorney's fees pursuant to *Sargeant*  
10 *v. Sargeant*; and
- 11 3. For other and further relief as the Court deems proper.

12 DATED this 9<sup>th</sup> day of October, 2019.

13 PECOS LAW GROUP

14   
15 

16 **Bruce I. Shapiro, Esq.**

17 Nevada Bar No. 004050

18 **Jack W. Fleeman, Esq.**

19 Nevada Bar No. 010584

20 PECOS LAW GROUP

21 8925 South Pecos Road, Suite 14A

22 Henderson, Nevada 89074

23 *Attorneys for Defendant*  
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**DECLARATION OF CHALESE SOLINGER**


I, **Chalese Solinger**, am the Defendant in the above entitled action. I make this declaration under penalty of perjury in support of the foregoing motion.

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

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

DATED this \_\_\_\_\_ day of October, 2019.

\_\_\_\_\_


  
CHALESE SOLINGER

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that the foregoing  
3 "DEFENDANT'S MOTION FOR TEMPORARY SPOUSAL SUPPORT AND  
4 PRELIMINARY ATTORNEY'S FEES" in the above-captioned case was served  
5 this date by e-service, pursuant to Rule 9 of N.E.F.C.R., E.D.C.R. 7.26(a)(4), and  
6 E.J.D.C. AO 9-12 and AO 14-2, to the following email(s), which is/are the  
7 email(s) registered with the electronic filing system:  
8

9  
10 Vincent Mayo VMGroup@TheAbramsLawFirm.com  
11 admin email email@pecoslawgroup.com  
12 Jack Fleeman jack@pecoslawgroup.com  
13 Amy Robinson amy@pecoslawgroup.com  
14 Bruce Shapiro bruce@pecoslawgroup.com  
15 Alicia Exley alicia@pecoslawgroup.com  
16 Angela Romero angela@pecoslawgroup.com  
17

18 DATED this 9<sup>th</sup> day of October, 2019.

19  
20   
21 Angela Romero,  
22 An Employee of PECOS LAW GROUP  
23  
24

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Adam Selinger  
Plaintiff/Petitioner

v. Chales Selinger  
Defendant/Respondent

Case No. D-19-588245-D

Dept. I

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

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

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

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

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

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

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

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

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

Party filing Motion/Opposition: Defendant Date 10/9/19

Signature of Party or Preparer [Signature]

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