

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

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ADAM MICHAEL SOLINGER,

Appellant,

vs.

CHALESE MARIE SOLINGER,

Respondent.

) Case No.: 84832-COA

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**APPELLANT'S APPENDIX
VOLUME 17**

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CERTIFICATE OF SERVICE

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

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

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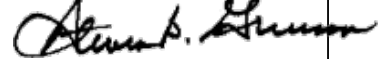
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11/02/2022	Transcript from April 14, 2022 Hearing (Trial Decision)	22	4771 - 4791
11/02/2022	Transcript from January 21, 2022 Evidentiary Hearing (Trial Day 2)	19	3994 - 4155
11/02/2022	Transcript from March 1, 2022 Evidentiary Hearing (Trial Day 3)	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



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Former Attorneys for Defendant

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

Adam Michael Solinger,

Plaintiff,

vs.

Chalese Marie Solinger,

Defendant.

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

Dept No. **P**

**PECOS LAW GROUP'S MEMORANDUM OF FEES AND COSTS PER
COURT'S INSTRUCTION ON MARCH 4, 2022**

Jack W. Fleeman, Esq., being first duly sworn, deposes and says:

1. The he is attorney duly licensed to practice law in the State of Nevada and is a prior attorney of record for the Defendant **Chalese Solinger** ("Chalese") in her divorce against Plaintiff **Adam Solinger** ("Adam"). Two other attorneys in Mr. Fleeman's firm, PECOS LAW GROUP, also worked on the case: **Bruce I. Shapiro, Esq.** and **Alicia S. May, Esq.** (f/k/a Alicia S. Exley, Esq.). Kristina Kirigan, Esq. and Shann D. Winesett, Esq. also did minimal work on the case, along with the firm's paralegals and staff.

2. PECOS LAW GROUP represented Chalese from August 14, 2019 to February 2020. Chalese briefly was represented by Vegas West Attorneys between February 2020 and March 2020, at which time Chalese re-retained PECOS LAW GROUP until September 2021.

3. The total amount of attorney's fees and costs incurred by Chalese with PECOS LAW GROUP from the period of August 14, 2019 to February 19, 2020 and March 25, 2020 to September 27, 2021 was \$204,760.72.

I. CALCULATION OF FEES

The total amount of attorney's fees and costs incurred by Chalese between the above-mentioned periods in connection with the divorce litigation can be summarized as follows:¹

Attorneys:	Rate	Hours	Fees
Bruce I. Shapiro, Esq.	\$575.00	73.65	\$42,348.75
Shann W. Winesett, Esq.	\$450.00	0.2	\$90.00
Jack W. Fleeman, Esq.	\$400.00	168.7	\$67,480.00
Kristina Kirigan, Esq.	\$350.00	2	\$700.00
Alicia S. May, Esq.	\$300.00	\$309.25	\$92,775.00
Total Attorney Fees:			\$203,393.75
Paralegals/Legal Assistants:			
Amy Robinson	\$180.00	5.4	\$972.00
Allan Brown	\$180.00	4.1	\$738.00

¹ A complete set of redacted billing statements is attached as Exhibit "A"

Angela Romero	\$180.00	54.85	\$9,873.00
Firm	\$180.00	8.25	\$1,485.00
Total Paralegal/Assistant Fees:			\$13,068.00
Costs:²			\$15,309.69
Courtesy Credits:			-\$27,010.72
<u>Total Fees:</u>			<u>\$204,760.72</u>

In addition to the courtesy credits listed above, several hours of work were “no-charged” to Chalese:

Bruce I. Shapiro, Esq.	\$575.00	15.7	\$9,027.50
Jack W. Fleeman, Esq.	\$400.00	17.27	\$6,908.00
Alicia S. May, Esq.	\$300.00	57.7	\$17,310.00
Amy Robinson	\$180.00	1.3	\$234.00
Allan Brown	\$180.00	0.2	\$36.00
Angela Romero	\$180.00	25.6	\$4,608.00
Firm	\$180.00	1.8	\$324.00
Total Amount “No-Charged”			\$38,447.50

II. BRUNZELL ANALYSIS

In *Sargeant v. Sargeant*, 88 Nev. 223, 495 P.2d 618 (1972), the Nevada Supreme Court established that disproportionate income is a basis for an award of fees. *Id.* at 226-227. Awarding attorney fees to the spouse with lesser income satisfies the goal of NRS 125.040 by assisting the requesting party to meet the other party in court on an “equal basis.” *Id.*

² \$4,750.00 of this amount consisted of expert witness fees to Dr. William O’Donohue.

1 In *Love v. Love*, 114 Nev. 1455, 959 P.2d 523 (1998), the Nevada Supreme
2 Court noted that a court may award attorney fees in family law cases in three
3 instances: 1) to the prevailing party; 2) for fees related to a divorce case; and 3) for
4 fees related to post-judgment motions in divorce cases.³ Seven years after *Love*,
5 the Court took an “opportunity to clarify [its] jurisprudence in family law cases to
6 require trial courts to evaluate the *Brunzell* factors when deciding attorney fee
7 awards.” *Miller v. Wilfong*, 121 Nev. 619, 624, 119 P.3d 727, 730 (2005) (citing
8 *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31(1969)).
9

10 The *Brunzell* factors are:

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

21 *Brunzell*, 85 Nev. at 349.

22 In *Wilfong*, the Nevada Supreme Court stated that in addition to considering
23 the *Brunzell* factors the “family law trial courts must also consider the disparity in
24 income of the parties when awarding fees.” *Wilfong*, 121 Nev. at 623 (citing
25 *Wright v. Osburn*, 114 Nev. 1367, 970 P.2d 1071 (1998)).
26

³ Citing NRS 18.010 (prevailing party); NRS 125.040 (divorce); and *Leeming v. Leeming*, 87 Nev. 530, 490 P.2d 342 (1971) (post-divorce judgment proceedings).

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

4 The *Brunzell* factors are analyzed as follows:⁴

5 **1) The Qualities of the Advocate: to include ability, training, education,**
6 **experience, professional standing and skill.**

7 **A. Bruce I. Shapiro, Esq.:** Mr. Shapiro is well-qualified and a member
8 in good standing of the State Bar of Nevada. Mr. Shapiro has been practicing law
9 for more than 30 years, primarily in the field of family law since 1990. He has
10 served as a Domestic Violence Commissioner, pro tempore; URESA/Paternity
11 Hearing Master, Alternate; Municipal Court Judge, Alternate; and Judicial
12 Referee, Las Vegas Justice Court, Small Claims. Mr. Shapiro has also written
13 several articles in the area of family law and has served on the Nevada Children's
14 Justice Task Force; Clark County Family Court Bench-Bar Committee; State Bar
15 of Nevada, Child Support Review Committee; State Bar of Nevada Southern
16 Nevada Disciplinary Board; State Bar of Nevada Standing Committee on Judicial
17 Ethics and Election Practices; and the Continuing Legal Education Committee.
18 Mr. Shapiro also served on the Board of Governors for the State Bar of Nevada
19 from 2003-2005 and 2008-2010.
20
21
22
23

24 ⁴ *Miller v. Wilfong*, 121 Nev. 619, 620, 119 P.3d 727, 730 (2005) (stating the
25 factors should be given equal weight).
26

1 **B. Jack W. Fleeman, Esq.:** Mr. Fleeman is well-qualified and a
2 member in good standing with the State Bar of Nevada. He has been practicing
3 law for more than 13 years and primarily in the field of family law. Over this span
4 of time, Mr. Fleeman has drafted thousands of papers and pleadings, has
5 participated in hundreds of hearings, and has appeared as lead counsel in over 30
6 trials. Mr. Fleeman is a Nevada certified family law specialized and has briefed
7 and argued several family law cases before the Nevada Supreme Court, including
8 the recently published cases of *Nguyen v. Boynes*, 133 Nev. Adv. Op. 32, 396 P.3d
9 774 (2017) and *Miller v. Miller*, 134 Nev. Adv. Op. 16 (Mar. 15, 2018). Mr.
10 Fleeman was one of only two private attorneys in Southern Nevada to be selected
11 to serve on the Nevada Supreme Court Committee to Study Child Custody reform,
12 and he was recently appointed to replace Judge Dawn Throne as a member on the
13 Nevada Standing Committee on Child Support.

14 **C. Shann D. Winesett, Esq.:** Mr. Winesett is well-qualified and a
15 member in good standing of the State Bar of Nevada. Mr. Winesett has been
16 practicing law for more than 24 years, primarily in the field of family law since
17 1997. He is a Certified Family Law Specialist, has published several articles and
18 attended several speaking engagements on family law and has served as a
19 Judge/hearing master for child support court, and truancy diversion.

20 **D. Kristina Kirigan, Esq.:** Ms. Kirigan has been practicing in family
21 and criminal law since 2004. She is well-qualified and a member in good standing
22
23
24
25
26

1 of the State Bar of Nevada, and previously would assist with Pecos Law Group
2 matters.

3 **E. Alicia S. May, Esq.:** Ms. May is well-qualified and a member in
4 good standing of the State Bar of Nevada. Ms. May worked for a family law
5 attorney for four years prior to graduating from law school, passing the Bar Exam,
6 and being admitted as a Nevada attorney. Ms. May has been practicing primarily
7 in the field of family law for the last four years. She serves on the Community
8 Service Committee of the Clark County Bar Association, earning her Committee
9 Circle of Support Awards for 2018 and 2019. She was also named a “Best Up &
10 Coming Attorney” by Nevada Business Magazine in 2018. Ms. Exley has spoken
11 about QDROs as part of the Downtown Cultural Series and had an article on
12 economic abuse in divorce litigation published in the *Nevada Lawyer* in 2019.
13

14 **F. Amy Robinson:** Certified Paralegal, Amy Robinson, joined Pecos
15 Law Group in 2007. She has been a family law paralegal since 1999. Ms.
16 Robinson attended Lansing Community College from 1990-1992. She completed
17 the Certified Paralegal Studies Program at the University of Nevada Las Vegas in
18 1998 with special emphasis in Family Law, and she completed the Advanced
19 Paralegal Studies Program at UNLV in 2000. Ms. Robinson is also a Certified
20 Divorce Financial Analyst.
21

22 **G. Allan Brown:** Allan Brown assisted on this case. Mr. Brown has a
23 Master’s Degree in Business Administration, and has assisted Pecos Law Group’s
24 senior attorneys for over four years.
25
26

1 **H. Angela Romero:** Ms. Romero has been working in the private sector
2 as a family law paralegal since 2002, and currently holds a Bachelor of Science in
3 Business Administration. Ms. Romero has over 18 years of family law experience
4 and worked for Pecos Law Group from 2017 to 2022.

5
6 **2) The Character of the Work to be Done: to include difficulty, importance,**
7 **time and skill required, the responsibility imposed and the prominence**
8 **and character of the parties where they affect the importance of the**
9 **litigation.**

10 This matter involved a highly contentious divorce matter which involved
11 issues of child custody, child support, property and debt division, alimony, marital
12 waste, attorney's fees, and issues regarding motions for sanctions. The case has, so
13 far, spanned over three years and has required numerous motions, oppositions, and
14 replies, as well as extensive discovery. While representing Chalese, PECOS LAW
15 GROUP prepared and filed approximately nine motions and 13 oppositions, served
16 several sets of discovery requests, and took three depositions.

17 These tasks took a high level of skill. The attorneys at PECOS LAW GROUP
18 possessed the unique skills required for family law cases to litigate this matter and
19 provide effective advocacy for Chalese. Two of the attorneys who worked on this
20 case – Mr. Fleeman and Mr. Winesett – are certified family law specialists.

21
22 **3) The Work Actually Performed by the Lawyer: to include the actual skill,**
23 **time and attention given to the work.**

24 As can be seen from the billing statements, a significant amount of time and
25 attention was given to this case by several different PECOS LAW GROUP attorneys.
26 Counsel prepared pleadings carefully with attention to detail, making sure to

1 include all relevant facts for the Court. In addition to the preparation of Court
2 filings, Counsel also served written discovery requests, subpoenaed documents,
3 took depositions, and prepared for trial.

4
5 **4) The Result Obtained.**

6 Counsel obtained positive results for Chalese on several occasions.

7 **5) Disparity of Income.**

8 There is a significant disparity of income between the parties, to Counsel's
9 knowledge.

10 **I declare under penalty of perjury under the laws of the State of**
11 **Nevada that the facts in the foregoing memorandum are true and correct.**
12

13
14 /s/ Jack W. Fleeman, Esq.

15 **JACK W. FLEEMAN, ESQ.**
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PECOS LAW GROUP

BRUCE I. SHAPIRO

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: August 29, 2019
Statement No. 53173
Account No. 1896.00
Page: 1

RE: Divorce

Please note this is a revised invoice showing your additional retainer of \$12,500.00 which did not reflect on the previous invoice in error.

Fees

			Rate	Hours	
08/14/2019	BS	Conference with client.			NO CHARGE
	BS	Prepare correspondence [REDACTED] [REDACTED] Prepare correspondence to V. Mayo regarding stipulation to continue calendar call and trial.	575.00	0.30	172.50
	AR	Prepare substitution of attorneys.	180.00	0.20	36.00
08/15/2019	BS	Email to client [REDACTED] [REDACTED]			NO CHARGE
	BS	Review available pleadings [REDACTED] [REDACTED]	575.00	0.70	402.50
08/16/2019	BS	Exchange emails with client [REDACTED] Telephone conference with client.	575.00	0.20	115.00
08/18/2019	BS	Exchange emails with client [REDACTED] [REDACTED]			NO CHARGE
08/21/2019	AR	Meeting with client [REDACTED]	180.00	0.50	90.00
08/23/2019	BS	Receive and review correspondence from Mayo dated 8.22.19 denying request to continue trial; Email to client.	575.00	0.20	115.00
	BS	Email to V. Mayo regarding hearing dates, discovery and trial; Email to client [REDACTED] Exchange emails with client [REDACTED] Review, revise and supplement outline for motion to continue.	575.00	0.40	230.00
	AR	Prepare subpoenas for Adam's employer; prepare notice of			

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 08/29/2019
 Statement No. 53173
 Page No. 2

			Rate	Hours	
		deposition of plaintiff prepare notices of depositions for employers; prepare receipt of copy.	180.00	0.60	108.00
	JWF	Review and begin to revise draft of motion to continue trial and for resumption of joint physical custody.	400.00	0.70	280.00
08/26/2019	JWF	Meet with client [REDACTED]	400.00	1.00	400.00
08/27/2019	AIR	Teleconference with client [REDACTED]	180.00	0.20	36.00
	BS	Review memorandum from J. Fleeman; Email to client [REDACTED] [REDACTED] Email to client [REDACTED]	575.00	0.30	172.50
	BS	Receive and review lien, motion to withdraw and adjudicate and notice of hearing from L. Schneider.	575.00	0.20	115.00
	BS	Review parenting plan and orders; Telephone conference with client; Email to Mayo regarding birthday visitation.	575.00	0.20	115.00
	BS	Receive and review email from client [REDACTED] [REDACTED]	575.00	0.20	115.00
	AR	Review Mayo's discovery requests [REDACTED] [REDACTED]	180.00	0.50	90.00
08/28/2019	AIR	Preparation of Certificate of Service for Substitution of Attorneys; submission of same to District Court for filing; and service on all parties.		0.20	NO CHARGE
	AIR	Review, revise and finalize Defendant's Motion to Continue Trial, et al.; preparation of Exhibit Addendum thereto; submission of both to District Court for filing; and service of same on opposing counsel.	180.00	0.50	90.00
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS	Receive and review correspondence [REDACTED] [REDACTED]	575.00	0.20	115.00
	BS	Review motion to continue trial.			NO CHARGE
	JWF	Review file, revise and complete draft of motion to continue trial.	400.00	2.30	920.00
		For Current Services Rendered		9.60	3,832.50

Expenses

08/28/2019	Filing Fee.	3.50
08/28/2019	Filing Fee.	3.50
	Total Expenses	7.00

003644

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 08/29/2019
Statement No. 53173
Page No. 3

Total Amount of this Bill 3,839.50

Payments

08/29/2019 Payment -3,839.50

Balance Due \$0.00

Trust Account

	Previous Balance in Trust	\$0.00
08/15/2019	Retainer- Solinger	2,500.00
08/19/2019	Additional Retainer- Solinger	12,500.00
08/29/2019	Payment	
	PAYEE: Pecos Law Group	-3,839.50
	Remaining Balance in Trust	<u>\$11,160.50</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after August 28, 2019 may not be reflected on this statement.

3. Payments Received after August 28, 2019 may not be reflected on this statement.

003645

PECOS LAW GROUP

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: October 1, 2019
Statement No. 53229
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
08/29/2019	AIR	Preparation of Ex Parte Motion for Order Shortening Time to hear Defendant's Motion to Continue, et al.; submission of same to District Court for filing; preparation of Order Shortening Time; and submission of same to Judge for review and signature.	180.00	0.50	90.00
	AIR	Teleconference [REDACTED] preparation of Notice of Hearing for Defendant's Motion to Continue Trial, et al.; submission of same to District Court for filing; and service on opposing counsel.	180.00	0.40	72.00
	AIR	Teleconference with client [REDACTED]	180.00	0.20	36.00
	AIR	Preparation of Certificate of Service for the court-issued Notice of Hearing; submission of same to District Court for filing; and service on opposing counsel.	180.00	0.20	36.00
	BS	Receive and review correspondence from V. Mayo dated 8.29.19.	575.00	0.20	115.00
	BS	Receive and review email from client [REDACTED]			NO CHARGE
	JWF	Review and sign Ex Parte Motion for Order Shortening Time.	400.00	0.20	80.00
	JWF	Review letter from V. Mayo regarding Quit Claim Deed issue	400.00	0.20	80.00
	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
08/30/2019	AIR	Meeting [REDACTED]	180.00	0.20	36.00

003646

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/01/2019
Statement No. 53229
Page No. 2

		Rate	Hours	
	BS Receive and review opposition to motion to continue.	575.00	0.20	115.00
	BS Conference with client [REDACTED]			
	[REDACTED] Exchange emails with client [REDACTED]	575.00	0.30	172.50
	BS Receive and review email from client [REDACTED]	575.00	0.20	115.00
	BS Receive and review email from client [REDACTED]	575.00	0.20	115.00
	JWF Meeting [REDACTED]		0.40	NO CHARGE
09/03/2019	AIR Revise and finalize letter to opposing counsel regarding depositions set for September 9, 2019.		0.20	NO CHARGE
	BS Exchange emails with client [REDACTED]			NO CHARGE
	BS Prepare correspondence to V. Mayo regarding noticed deposition of his client.	575.00	0.20	115.00
	BS Receive and review email from client [REDACTED] Receive and review correspondence from Mayo regarding deposition of client; Receive and review [REDACTED]	575.00	0.20	115.00
	JWF Review opposing counsel letter regarding deposition		0.20	NO CHARGE
	JWF Draft letter to opposing counsel regarding deposition and good faith	400.00	0.30	120.00
	AR Email to client [REDACTED]	180.00	0.20	36.00
09/04/2019	AIR Teleconference [REDACTED] [REDACTED] preparation of Receipt of Copy for same to be served on opposing counsel; and submission of Receipt of Copy to District Court for filing.	180.00	0.20	36.00
	AIR Teleconference [REDACTED]	180.00	0.20	36.00
	AIR Teleconference with client [REDACTED]		0.20	NO CHARGE
	AIR Teleconference with opposing counsel regarding the deposition set for today.	180.00	0.20	36.00
	BS Telephone conference with client [REDACTED] [REDACTED] Prepare responses to request for documents and interrogatories; Exchange multiple emails with client [REDACTED]	575.00	1.20	690.00
	AR Prepare responses to first request for production of documents and first interrogatories. (4.4 hours spent)	180.00	2.50	450.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/01/2019
Statement No. 53229
Page No. 3

			Rate	Hours	
09/05/2019	AIR	Preparation of Amended Notice of Taking Deposition of Plaintiff; and service of same on opposing counsel.		0.40	NO CHARGE
	AIR	Preparation of correspondence [REDACTED]	180.00	0.20	36.00
	AIR	Download entire court record of pleadings from online court attorney portal; organization of same and assembly of complete client file.	180.00	4.50	810.00
	BS	Receive and review correspondence from V. Mayo regarding motion to continue trial.	575.00	0.20	115.00
	AR	Finalize responses to first request for production of documents and first interrogatories.		0.30	NO CHARGE
09/06/2019	AIR	Teleconference with client [REDACTED]		0.20	NO CHARGE
	AIR	Preparation of initial draft of Defendant's List of Witnesses for Trial.	180.00	0.20	36.00
	AIR	Teleconference [REDACTED]		0.20	NO CHARGE
	AIR	Preparation of Notice of Vacating Deposition of Plaintiff, and service of same on opposing counsel.		0.40	NO CHARGE
	BS	Prepare for hearing; Court appearance.	575.00	3.00	1,725.00
	JWF	Letter to Mayo regarding deed and proceeds held in escrow.	400.00	0.30	120.00
09/08/2019	BS	Email to V. Mayo regarding deposition dates and settlement; [REDACTED] Email to Mayo regarding collateral; Email to [REDACTED] Exchange emails with client [REDACTED]	575.00	5.00	2,875.00
09/09/2019	AIR	Meeting [REDACTED]		1.30	NO CHARGE
	AIR	Receipt and review [REDACTED]	180.00	1.50	270.00
	AIR	Correspondence to opposing counsel as our 3rd request for the documents he served in the First set of 16.2 Disclosures in March, 2019.	180.00	0.20	36.00
	AIR	Revise and finalize Defendant's List of Witnesses for Trial; submission of same to District Court for filing; and service on			

003648

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/01/2019
Statement No. 53229
Page No. 4

		Rate	Hours	
	opposing counsel.		0.30	NO CHARGE
AIR	Revise and finalize Notice of Intent to File Opposition to Prior Counsel's Motion to Adjudicate Attorney's Lien; submission of same to District Court for filing; and service on all parties.		0.30	NO CHARGE
AIR	Correspondence to opposing counsel requesting copies of any and all NRCP 16.2 Disclosures that have been propounded in this case, to date.		0.20	NO CHARGE
AIR	Preparation of initial draft of Defendant's Trial Brief.	180.00	2.00	360.00
BS	Exchange emails with V. Mayo regarding disclosures and deposition dates.	575.00	0.20	115.00
BS	Conference with client [REDACTED] Review, revise and supplement Adam's deposition outline.	575.00	1.50	862.50
BS	Review [REDACTED] Supplement trial memorandum and Adam's deposition outline; Email to client; Exchange emails with client [REDACTED]	575.00	3.00	1,725.00
JWF	Meeting [REDACTED]		1.20	NO CHARGE
09/10/2019	AIR	Preparation of Notice of Taking Deposition of Plaintiff; and service of same on opposing counsel.	180.00	0.20 36.00
	AIR	Correspondence [REDACTED]		0.20 NO CHARGE
	AIR	Preparation of Amended Notice of Taking Deposition of Plaintiff; service of same on opposing counsel; and correspondence [REDACTED]		0.20 NO CHARGE
	AIR	Preparation of Deposition Subpoena Duces Tecum for Las Vegas Defense Group and Notice of Deposition Subpoena; correspondence [REDACTED] and service of Notice on opposing counsel.	180.00	0.40 72.00
	AIR	Receipt and review of all NRCP 16.2 Disclosures propounded by both parties to date; and organization of same for client file.		1.00 NO CHARGE
	AE	Begin review of case file		1.00 NO CHARGE
	BS	Receive and review [REDACTED] [REDACTED] Receive and review email from Mayo regarding deposition dates and trust funds proceeds; Email to client [REDACTED]	575.00	0.30 172.50
	BS	Review all initial disclosures; Multiple email exchanges with client; Email to V. Mayo requesting additional documents and whether will accept service for Jessica; Email to client [REDACTED]	575.00	2.50 1,437.50

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/01/2019
Statement No. 53229
Page No. 5

			Rate	Hours	
09/11/2019	AIR	Preparation of initial draft of Defendant's 2nd set of NRCP 16.2 Disclosures.	180.00	2.50	450.00
	AE	Finish review of case file		1.50	NO CHARGE
	BS	Receive and review notice of subpoena from V. Mayo.	575.00	0.20	115.00
09/12/2019	AIR	Revise and finalize Defendant's 2nd set of NRCP 16.2 Disclosures and Witness List, including combining, redacting, and Bates numbering of all documents.		1.00	NO CHARGE
	AIR	Correspondence to client [REDACTED]		0.20	NO CHARGE
	JWF	[REDACTED]	400.00	0.80	320.00
	JWF	Draft opposition to motion to adjudicate attorneys lien.	400.00	1.70	680.00
	AR	Continue preparing responses to request for production of documents.		0.80	NO CHARGE
09/13/2019	AIR	Correspondence [REDACTED]		0.20	NO CHARGE
	AIR	Correspondence to client, [REDACTED]	180.00	0.20	36.00
	AIR	Correspondence to client, [REDACTED]		0.20	NO CHARGE
	AIR	Review, revise and finalize Defendant's Opposition to Louis C. Schneider's Motion to Adjudicate Attorney's Lien; preparation of Court cover sheet; submission of same to District Court for filing; and service on all parties.		0.50	NO CHARGE
	AIR	Teleconference with client [REDACTED]		0.20	NO CHARGE
	AE	[REDACTED]	300.00	0.80	240.00
	BS	Exchange emails with Mayo regarding depositions.	575.00	0.20	115.00
09/14/2019	BS	Receive and review subpoena from Mayo to smoke shop; Receive and review 4th set of disclosures.	575.00	0.20	115.00
09/16/2019	AIR	Receive, review and compile Plaintiff's 4th set of NRCP 16.2 Disclosures and Witness List.	180.00	0.50	90.00
	AE	Begin draft of proposed findings of fact, conclusions of law, and decree of divorce	300.00	1.40	420.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/01/2019
Statement No. 53229
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		Rate	Hours	
	AIR Preparation of Objections as to Authenticity or Genuineness to Plaintiff's 3rd and 4th sets of NRCP 16.2 Disclosures; and service of same on opposing counsel.	180.00	0.20	36.00
	AIR Continue to work on Trial Brief.		0.60	NO CHARGE
	BS Receive and review email from client [REDACTED]			NO CHARGE
	BS Prepare for deposition of Adam; Review new disclosures; Conduct deposition of Adam.	575.00	3.75	2,156.25
	BS Receive and review email from client [REDACTED] Email to client.	575.00	0.20	115.00
	BS Receive and review email from Mayo regarding Jessica; Email to client.	575.00	0.20	115.00
	JWF Review Opposing Party 4th Disclosures, including videos and audio recordings.	400.00	1.50	600.00
09/17/2019	AIR Preparation of Notice of UNLV Cooperative Parenting Program Seminar Completion cover sheet; submission of same to District Court for filing; and service on opposing counsel.	180.00	0.20	36.00
	AE Continue preparing trial brief	300.00	1.20	360.00
	BS Exchange emails with Depo International regarding expedited transcript.			NO CHARGE
	BS Receive and review email from client [REDACTED] [REDACTED] Email to client.	575.00	0.20	115.00
	JWF [REDACTED]	400.00	0.70	280.00
09/18/2019	AIR Preparation and service of correspondence to opposing counsel regarding questions on statements they provided in their disclosures.		0.30	NO CHARGE
	BS Review client's financial disclosure form; Review exhibits; Conference with client [REDACTED] Email to client	575.00	1.50	862.50
	BS Legal research [REDACTED]	575.00	0.50	287.50
	BS Receive and review Plaintiff's fifth set of disclosures; Correspondence to V. Mayo regarding explanations for specific charges.	575.00	0.40	230.00
09/19/2019	AIR Preparation of Defendant's 3rd set of NRCP 16.2 Disclosures and Witness List; and service of same on opposing counsel.		0.60	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

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		Rate	Hours	
	AIR Teleconference [REDACTED]		0.20	NO CHARGE
	BS Review [REDACTED]			
	[REDACTED] Email to Mayo regarding credit card points redemption; Email to client [REDACTED] Email to client [REDACTED]	575.00	1.50	862.50
	BS Telephone conference [REDACTED]	575.00	0.20	115.00
	BS Email to client [REDACTED]			NO CHARGE
	BS Exchange emails with client [REDACTED]	575.00	0.20	115.00
	JWF Telephone call [REDACTED]	400.00	0.20	80.00
	JWF [REDACTED]	400.00	0.50	200.00
	JWF Email to client [REDACTED]	400.00	0.20	80.00
09/20/2019	AE [REDACTED] review 911 calls and videos disclosed by opposing counsel	300.00	2.00	600.00
	BS Exchange emails with client [REDACTED]			NO CHARGE
	BS Receive and review email from Mayo on credit card points; Receive and review email from Mayo regarding preservation letter.	575.00	0.20	115.00
09/22/2019	JWF [REDACTED]	400.00	2.30	920.00
	FIR [REDACTED]	180.00	3.25	585.00
09/23/2019	AIR Teleconference [REDACTED]		0.20	NO CHARGE
	AIR Teleconference [REDACTED]		0.20	NO CHARGE
	AE Review Adam deposition transcript		1.20	NO CHARGE
	AE Conduct research [REDACTED] prepare 4th supplemental disclosure		0.90	NO CHARGE
	BS Receive and review Adam's deposition transcript; Begin preparing for Adam's trial exam; Exchange emails with client [REDACTED] [REDACTED] Receive and review email from Mayo regarding discovery.	575.00	6.00	3,450.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

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Statement No. 53229
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		Rate	Hours	
	BS Receive and review offer of judgment from V. Mayo.	575.00	0.20	115.00
	JWF [REDACTED]	400.00	3.20	1,280.00
	JWF Emails [REDACTED]	400.00	0.40	160.00
09/24/2019	AIR Teleconference [REDACTED]		0.20	NO CHARGE
	AIR Teleconference [REDACTED]		0.30	NO CHARGE
	AIR Preparation of Notice of Vacating Deposition (Duces Tecum) of Custodian of Records for Las Vegas Defense Group; and service of same on all parties.		0.40	NO CHARGE
	AIR Correspondence [REDACTED]		0.20	NO CHARGE
	AIR Review of all prior orders [REDACTED]		0.50	NO CHARGE
	AIR Receipt and review of documents delivered by Las Vegas Defense Group in response to our subpoena duces tecum.		0.20	NO CHARGE
	AE Prepare pre-trial memorandum; continue preparing trial brief; review July 2019 hearing video	300.00	2.70	810.00
	AE Finalize and process 4th supplemental disclosure		0.20	NO CHARGE
	BS Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS Exchange emails [REDACTED]	575.00	0.20	115.00
	BS Email to client [REDACTED]			NO CHARGE
09/25/2019	BS Receive and review subpoenaed documents from LV Defense Group.	575.00	0.20	115.00
	BS Receive and review Adam's updated financial disclosure form.	575.00	0.20	115.00
	BS Travel to and from Mayo's office for client's deposition; Review, revise and supplement client's trial exam.	575.00	7.00	4,025.00
	AE Prepare marital balance sheet	300.00	0.30	90.00
	AE [REDACTED]	300.00	1.70	510.00

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

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			Rate	Hours	
	AE	[REDACTED]	300.00	0.40	120.00
	AE	Begin draft of 1st set of interrogatories and requests for admissions	300.00	0.60	180.00
	AE	Continue preparing trial brief; [REDACTED]	300.00	1.50	450.00
09/26/2019	BS	Email to client [REDACTED] Email to Mayo.	575.00	0.20	115.00
	AE	[REDACTED]		0.20	NO CHARGE
09/27/2019	AE	Finish draft of pre-trial memorandum		0.30	NO CHARGE
	BS	Email to client [REDACTED]	575.00	0.20	115.00
	BS	Exchange emails with client [REDACTED]	575.00	0.40	230.00
09/28/2019	FIR	[REDACTED]	180.00	3.00	540.00
09/29/2019	FIR	[REDACTED]	180.00	2.00	360.00
09/30/2019	AIR	Preparation of Re-Notice of Hearing for Defendant's Motion to Continue Trial, et al.; submission of same to District Court for filing; and service on opposing counsel.		0.40	NO CHARGE
	AIR	Review, revise and finalize Ex Parte Motion for Order Shortening Time; and preparation of Order Shortening Time regarding re-notice of hearing Defendant's Motion to Continue Trial, et al.		0.40	NO CHARGE
	AR	Prepare COPE certificate pleading.	180.00	0.20	36.00
	AIR	Preparation of Certificate of Service for the court's Notice of Hearing; submission of same to District Court for filing; and service on opposing counsel.		0.30	NO CHARGE
	AE	Finish drafts of 1st interrogatories and requests for admissions; finalize and process same		0.40	NO CHARGE
	AE	Begin review of Plaintiff's 6th disclosure	300.00	0.50	150.00
	BS	Email to client [REDACTED] Email to Mayo regarding continuing trial and order shortening time.	575.00	0.20	115.00
	BS	Prepare application for order shortening time on motion to continue trial.	575.00	0.20	115.00
	BS	Review admissions and request for interrogatories.			NO CHARGE
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

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	Rate	Hours	
For Current Services Rendered		95.10	38,567.75

Expenses

08/29/2019	Filing Fee.	3.50
08/29/2019	Filing Fee.	3.50
08/29/2019	Filing Fee.	3.50
09/03/2019	Process Server. John Wilks Process Serving	180.00
09/04/2019	Filing Fee.	3.50
09/09/2019	Filing Fee.	3.50
09/09/2019	Filing Fee.	3.50
09/12/2019	Filing Fee.	3.50
09/13/2019	Filing Fee.	3.50
09/16/2019	Process Server. John Wilks Process Serving	260.00
09/17/2019	Filing Fee.	3.50
09/30/2019	Filing Fee.	3.50
09/30/2019	Filing Fee.	3.50
	Total Expenses	478.50
	Total Amount of this Bill	39,046.25

Payments

10/01/2019	Payment	-11,160.50
	Balance Due	<u>\$27,885.75</u>

Trust Account

	Previous Balance in Trust	\$11,160.50
10/01/2019	Payment	
	PAYEE: Pecos Law Group	-11,160.50
	Remaining Balance in Trust	\$0.00

Please Remit	<u>\$27,885.75</u>
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1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after September 30, 2019 may not be reflected on this statement.

3. Payments Received after September 30, 2019 may not be reflected on this statement.

003655

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: October 31, 2019
Statement No. 53454
Account No. 1896.00
Page: 1

RE: Divorce

Courtesy Credit from Bruce Shapiro.

Fees

			Rate	Hours	
09/24/2019	JWF	Telephone conference with V. Mayo regarding COR deposition for LVDG records.	400.00	0.20	80.00
	JWF	Initial review of Adam employer records.	400.00	0.20	80.00
09/30/2019	JWF	[REDACTED]	400.00	0.50	200.00
	JWF	Review opposing 6th disclosures.	400.00	0.80	320.00
10/01/2019	AE	Finish review of Plaintiff's 6th disclosure		0.70	NO CHARGE
	AE	Begin preparing proposed findings of fact, conclusions of law, and decree of divorce	300.00	1.70	510.00
	AE	Prepare 10/3/19 hearing outline; [REDACTED]	300.00	0.70	210.00
	BS	Receive and review email from Mayo regarding continuance; Email to client [REDACTED]	575.00	0.20	115.00
	BS	Receive and review Plaintiff's sixth production; Review, revise and supplement client's trial examination.	575.00	0.40	230.00
	BS	Email to client [REDACTED]			NO CHARGE
	BS	Exchange emails with client [REDACTED]			
		[REDACTED] Review, revise and supplement Adam's trial examination based on the 6th document disclosures.	575.00	0.80	460.00
	BS	Receive and review correspondence [REDACTED]			NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/31/2019
Statement No. 53454
Page No. 2

			Rate	Hours	
	JWF	Review opposing party disclosures; specifically private investigator report.	400.00	0.30	120.00
10/02/2019	AIR	Prep client file for hearing tomorrow, October 3, 2019.		1.00	NO CHARGE
	AIR	Preparation of Defendant's 5th set of NRCP 16.2 Disclosures and Witness List; and service of same on opposing counsel.	180.00	1.00	180.00
	AIR	Correspondence to client [REDACTED]	180.00	0.20	36.00
	AE	Review Chalese's deposition transcript	300.00	1.10	330.00
	AE	[REDACTED] continue preparing trial brief; begin review/revisions to Adam's trial exam	300.00	0.80	240.00
	AE	Prepare reply to opposition to motion to continue; finalize and process same; phone call and email to Dept. I regarding: same	300.00	1.10	330.00
	BS	Email to client [REDACTED]	575.00	0.20	115.00
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS	Receive and review opposition to motion to continue; Review, revise and supplement reply.	575.00	0.40	230.00
10/03/2019	AE	Finish additions to Adam's trial exam	300.00	1.40	420.00
	BS	Prepare for hearing; Court appearance.	575.00	3.50	2,012.50
10/04/2019	AE	Prepare motion for temporary spousal support; revisions to same; redact billing statements for exhibit	300.00	1.50	450.00
	BS	Email to Mayo regarding stipulation for Jessica and Josh; Email to Mayo regarding custody evaluation; Email proposed stipulation regarding significant others to Mayo; Email to client [REDACTED]	575.00	0.50	287.50
	BS	Review, revise and supplement motion for temporary support, etc.	575.00	0.20	115.00
	AR	Prepare stipulation and order regarding witnesses.	180.00	0.20	36.00
10/07/2019	AE	Further redactions to billing statements; prepare 6th supplemental disclosure; prepare exhibits to motion	300.00	0.60	180.00
10/08/2019	AE	Phone call with client [REDACTED] begin draft of updated financial disclosure form	300.00	0.60	180.00
	BS	Email to client [REDACTED]			NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/31/2019
Statement No. 53454
Page No. 3

			Rate	Hours	
	BS	Email to Mayo regarding stipulation for witnesses.			NO CHARGE
	JWF	Telephone call [REDACTED]	400.00	0.40	160.00
	JWF	Telephone call [REDACTED]	400.00	0.20	80.00
10/09/2019	AE	Revisions to motion for temporary spousal support; finalize and process motion and exhibits	300.00	0.40	120.00
	AE	Meet with client [REDACTED]	300.00	0.90	270.00
	BS	Review client's financial disclosure form; Review, revise and supplement motion for temporary orders.			NO CHARGE
	JWF	Prepare for Hearing; Attend Hearing regarding Schneider Attorney's Fees	400.00	1.50	600.00
	JWF	Meeting with Client [REDACTED]	400.00	0.30	120.00
10/10/2019	AIR	Preparation of Notice of Hearing; submission of same to District Court for filing; and service on opposing counsel.		0.20	NO CHARGE
	AIR	Preparation of Certificate of Service for the court's Notice of Hearing; submission of same to District Court for filing; and service on opposing counsel.	180.00	0.20	36.00
	JWF	Email [REDACTED]	400.00	0.20	80.00
	JWF	Meeting with client [REDACTED]	400.00	0.20	80.00
10/11/2019	BS	Correspondence to V. Mayo following up on stipulation excluding Josh and Jessica from proceedings.	575.00	0.20	115.00
	JWF	Communications [REDACTED]		0.30	NO CHARGE
	JWF	Telephone conference [REDACTED]		0.20	NO CHARGE
10/15/2019	AE	Prepare ex parte application for order shortening time and order shortening time; phone call with client [REDACTED]	300.00	0.50	150.00
10/16/2019	AE	Prepare documents from client for disclosure; prepare 7th supplemental disclosure	300.00	0.30	90.00
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/31/2019
Statement No. 53454
Page No. 4

			Rate	Hours	
10/17/2019	BS	Email [REDACTED]	575.00	0.20	115.00
10/22/2019	BS	Receive and review email from Mayo dated 10.22.19 regarding computer expert; Email to Mayo regarding Jessica; Email to client [REDACTED]	575.00	0.20	115.00
10/23/2019	AE	Prepare deposition subpoena and notice of deposition of Jessica Sellers; prepare receipt of copy of same; prepare notice of non-opposition	300.00	0.25	75.00
10/24/2019	AE	Review opposition to motion for temporary orders and counter-motion for fees; prepare reply and opposition	300.00	2.75	825.00
	AE	Revise notice of deposition of Jessica; finalize and process same		0.20	NO CHARGE
	AE	Review motion to compel from opposing counsel	300.00	0.20	60.00
	BS	Research [REDACTED]			NO CHARGE
10/28/2019	AE	Begin preparing supplemental discovery responses; [REDACTED] email to client [REDACTED]	300.00	2.00	600.00
	AE	Prepare letter [REDACTED] finalize and process same; begin preparing documents [REDACTED]	300.00	0.80	240.00
	BS	Telephone conference with client [REDACTED] Receive and review email from client.	575.00	0.20	115.00
	BS	Review, revise and supplement opposition and counter-motion.			NO CHARGE
	BS	Telephone conference [REDACTED] Email [REDACTED] [REDACTED] Receive and review email [REDACTED]	575.00	0.30	172.50
10/29/2019	AE	Continue preparing documents [REDACTED] revise deposition subpoena for Jessica	300.00	0.40	120.00
	BS	Receive and review notice of deposition of Josh; Email to client [REDACTED]	575.00	0.20	115.00
10/30/2019	AE	Prepare subpoenas to private investigator and children's daycare; prepare notice of subpoenas of same; finalize and process same; finish preparing documents [REDACTED]	300.00	1.40	420.00
	AE	Finalize and process notice of subpoenas; revise reply to opposition to motion for temporary support; begin preparing opposition to motion to compel	300.00	0.30	90.00
	BS	Receive and review correspondence from V. Mayo objecting to authenticity of documents.	575.00	0.20	115.00
		For Current Services Rendered		34.40	12,890.50

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Chalese Solinger
Account No. 1896.00
RE: Divorce

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Expenses

10/01/2019	Filing Fee.	3.50
10/02/2019	Filing Fee.	3.50
10/10/2019	Transcript. Western Reporting Services, Inc.	680.65
10/10/2019	Filing Fee.	3.50
10/10/2019	Filing Fee.	3.50
10/10/2019	Filing Fee.	3.50
	Total Expenses	698.15
	Total Amount of this Bill	13,588.65
	Previous Balance	\$27,885.75

Payments

10/09/2019	Payment -thank you	-10,000.00
10/16/2019	Payment -thank you	-17,000.00
	Total Payments	-27,000.00
	Interest on overdue balance	6.55
	Courtesy Credit	-5,000.00
	Balance Due	<u>\$9,480.95</u>
	Please Remit	<u>\$9,480.95</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after October 30, 2019 may not be reflected on this statement.

3. Payments Received after October 30, 2019 may not be reflected on this statement.

003660

PECOS LAW GROUP

BRUCE I. SHAPIRO

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Henderson, NV 89074

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: December 6, 2019
Statement No. 53893
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
10/31/2019	AE	Email to client [REDACTED] prepare exhibits to reply; prepare 1st set of requests for production; prepare 2nd set of interrogatories	300.00	1.40	420.00
11/01/2019	AE	Revisions to reply; email to client [REDACTED] review 9/6/19 and 10/3/19 hearing videos and review proposed orders from opposing counsel	300.00	0.75	225.00
	AE	Telephone conference [REDACTED]		0.50	NO CHARGE
	BS	Receive and review email from Mayo with proposed orders.			NO CHARGE
	BS	Telephone conference [REDACTED]	575.00	0.40	230.00
11/03/2019	BS	Exchange emails with client [REDACTED]			NO CHARGE
11/04/2019	AE	Finalize and process reply and exhibits		0.20	NO CHARGE
	AE	Email to client [REDACTED] continue preparing supplemental discovery responses; begin preparing 7th supplemental disclosure	300.00	1.00	300.00
	AE	Continue preparing opposition to motion to compel	300.00	0.70	210.00
	AE	Prepare letters to opposing counsel regarding: orders and discovery responses; finalize and process same; finish, finalize, and process 2nd set of interrogatories and 1st set of requests for production	300.00	0.90	270.00
	BS	Telephone conference with client [REDACTED]	575.00	0.25	143.75
	BS	Exchange emails with client [REDACTED]			NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 12/06/2019
Statement No. 53893
Page No. 2

			Rate	Hours	
	BS	Receive and review [REDACTED]	575.00	0.20	115.00
	JWF	Draft affidavit of attempted service.	400.00	0.40	160.00
11/06/2019	AE	Email to client [REDACTED] finish preparing supplemental discovery responses	300.00	2.00	600.00
	JWF	Review file [REDACTED]	400.00	0.70	280.00
11/07/2019	AE	Prepare 1st expert disclosure; add N. Ponzo information and CV to 7th disclosure; prepare trial subpoena to Jessica Sellers	300.00	0.70	210.00
	AE	Begin preparing Jessica Sellers deposition outline	300.00	1.30	390.00
	AE	Meeting [REDACTED]		0.90	NO CHARGE
	AE	Finalize and process opposition and supplemental interrogatory responses; prepare errata to opposition and supplemental verification to interrogatory responses	300.00	0.40	120.00
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS	Telephone conference [REDACTED] Receive and review subpoena to Hair Cuts Are Fun; Email to client.	575.00	0.30	172.50
	BS	[REDACTED]	575.00	0.75	431.25
	BS	Receive and review email from Mayo's office regarding supplemental discovery responses; Email to client [REDACTED]	575.00	0.20	115.00
	JWF	[REDACTED]		0.80	NO CHARGE
11/08/2019	AE	Meet with client [REDACTED] finalize and process errata to opposition and supplemental verification to interrogatory responses; continue preparing Jessica Sellers deposition outline	300.00	0.60	180.00
	JWF	Emails with opposing counsel; telephone call [REDACTED] emails with client [REDACTED]	400.00	0.40	160.00
11/10/2019	AE	Prepare deposition outline	300.00	1.30	390.00
11/12/2019	AE	Phone call to and email to client [REDACTED]	300.00	0.20	60.00
	AE	Finish Jessica Sellers deposition outline	300.00	1.60	480.00
	AE	Meet with J. Fleeman and client [REDACTED]	300.00	1.20	360.00
11/13/2019	AE	Email to client [REDACTED]	300.00	0.20	60.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 12/06/2019
Statement No. 53893
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			Rate	Hours	
	AE	Review Plaintiff's 7th supplemental disclosure	300.00	0.80	240.00
	JWF	Emails and communications with V. Mayo and client [REDACTED]			
		[REDACTED]	400.00	0.30	120.00
11/14/2019	AE	Prepare motion for child custody evaluation	300.00	1.80	540.00
	BS	Receive and review Plaintiff's response, exhibits, trial subpoena.			NO CHARGE
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS	Email to client [REDACTED]			NO CHARGE
11/15/2019	AE	Email to client [REDACTED] prepare exhibits to motion for child custody evaluation	300.00	0.50	150.00
	AE	Prepare response to Plaintiff's response to our reply to Plaintiff's opposition to our motion for temporary orders	300.00	2.30	690.00
	AE	Prepare deposition subpoena to Michael Solinger; prepare deposition subpoena to private investigator	300.00	0.40	120.00
	AE	Attend deposition of Josh Lloyd (opposing counsel was a no-show)	300.00	2.20	660.00
	BS	Review, revise and supplement response.			NO CHARGE
11/17/2019	AE	Prepare notice of subpoena to Michael Solinger and notice of deposition of private investigator		0.40	NO CHARGE
11/18/2019	AE	Phone call [REDACTED]		0.20	NO CHARGE
	AE	Prepare exhibits to response; finalize and process response and exhibits	300.00	1.10	330.00
	AE	Prepare certificate of service of notice of hearing; finalize and process same, plus deposition notices and notice of hearing		0.30	NO CHARGE
	AE	Prepare outline for 11/21/19 hearing; phone call with client [REDACTED] email to client [REDACTED]	300.00	1.20	360.00
	AE	Phone calls [REDACTED] [REDACTED]	300.00	0.40	120.00
	BS	Exchange emails [REDACTED] [REDACTED] Email to client [REDACTED] [REDACTED] Email to client [REDACTED] [REDACTED] Exchange emails with client [REDACTED]	575.00	0.80	460.00
11/19/2019	AE	Phone call with opposing counsel regarding: fees; email to			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 12/06/2019
Statement No. 53893
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		Rate	Hours	
	opposing counsel regarding: same	300.00	0.30	90.00
	AE Book court reporter for PI deposition; prepare letter [REDACTED] [REDACTED] email client [REDACTED]		0.40	NO CHARGE
	AE Review documents from PI; meet [REDACTED] [REDACTED]	300.00	1.00	300.00
	BS Receive and review email [REDACTED] Email to client [REDACTED]	575.00	0.20	115.00
	BS Telephone conference [REDACTED]	575.00	0.30	172.50
	BS Telephone conference with V. Mayo.	575.00	0.20	115.00
11/20/2019	AE Respond to client email [REDACTED] finish review of documents from PI; prepare PI deposition outline	300.00	3.60	1,080.00
	AE Review motion for protective order; prepare joinder and countermotion for fees	300.00	1.70	510.00
	AE Review documents from daycare	300.00	0.30	90.00
	BS Review, revise and supplement opposition to protective order.			NO CHARGE
	BS Review multiple pleadings file and served; Begin preparing for hearing.	575.00	0.50	287.50
	JWF Review and revise motion for protective order.		0.30	NO CHARGE
11/21/2019	AE Prepare letter [REDACTED] add additional questions to PI deposition outline; email opposing counsel regarding: deposition of Carmen and 10.3.19 order; review subpoenas served by opposing counsel; email to client [REDACTED] [REDACTED]	300.00	0.80	240.00
	AE Review new records from daycare; prepare daycare and PI records for disclosure; prepare 8th supplemental disclosure; finalize and process ex parte application for order shortening time and order shortening time	300.00	1.50	450.00
	AE Prepare, finalize, and process authenticity objection; prepare exhibits to joinder	300.00	0.20	60.00
	BS Prepare for hearing.	575.00	1.50	862.50
	BS Court appearance.		1.50	NO CHARGE
11/22/2019	AE Review [REDACTED] prepare subpoena to Abrams & Mayo and notice of subpoena; finalize and process same	300.00	0.50	150.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 12/06/2019
Statement No. 53893
Page No. 5

			Rate	Hours	
	AE	Finalize and process joinder and exhibits; email to client [REDACTED] email to opposing counsel regarding: response to 11/20/19 letter	300.00	0.50	150.00
	BS	Receive and review notice of rescheduling from Dept. I.			NO CHARGE
	BS	Email to client [REDACTED]			NO CHARGE
11/25/2019	AE	Emails with client [REDACTED] begin 2nd supplemental discovery responses; contact [REDACTED]	300.00	0.70	210.00
	AIR	Teleconference and correspondence [REDACTED]		0.20	NO CHARGE
11/26/2019	AE	Add questions to Jessica deposition outline; review Plaintiff's 8th supplemental disclosure; prepare authenticity objection and finalize and process same; prepare for Jessica deposition; email to client [REDACTED]	300.00	1.00	300.00
	BS	Exchange emails with client [REDACTED]			NO CHARGE
	BS	Email to client [REDACTED]	575.00	0.20	115.00
11/27/2019	AE	Take deposition of Jessica Sellers	300.00	1.90	570.00
	AE	Add billing statements to 8th supplemental disclosure; phone call with client [REDACTED] prepare notice of deposition of Curtis Child; finalize and process same	300.00	0.70	210.00
	JWF	Telephone call [REDACTED]	400.00	0.20	80.00
		For Current Services Rendered		47.85	16,260.00

Expenses

11/01/2019	Witness Fee. Jessica Sellers	39.00
11/04/2019	Filing Fee.	3.50
11/04/2019	Filing Fee.	3.50
11/08/2019	Depo International-Transcript for Adam Solinger's deposition.	1,551.48
11/08/2019	Filing Fee.	3.50
11/08/2019	Filing Fee.	3.50
11/15/2019	Filing Fee.	3.50
11/15/2019	Filing Fee.	3.50
11/18/2019	Witness Fee. Elite Investigations	37.00
11/18/2019	Process Server. John Wilks Process Serving	322.00
11/18/2019	Filing Fee.	3.50
11/21/2019	Miscellaneous. Learning Care Group, Inc.	15.00
11/21/2019	Filing Fee.	3.50
11/22/2019	Filing Fee.	3.50
11/25/2019	Witness Fee. Michael Solinger	39.00
11/25/2019	Witness Fee. Jessica Sellers	39.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 12/06/2019
Statement No. 53893
Page No. 6

Total Expenses	2,073.98
Total Amount of this Bill	18,333.98
Previous Balance	\$9,480.95
<u>Payments</u>	
12/05/2019 Payment -thank you	-25,000.00
Balance Due	<u>\$2,814.93</u>
Please Remit	<u>\$2,814.93</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after November 30, 2019 may not be reflected on this statement.

3. Payments Received after November 30, 2019 may not be reflected on this statement.

003666

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com
[REDACTED]

Statement Date: January 2, 2020
Statement No. 53949
Account No. 1896.00
Page: 1

RE: Divorce

Your account is PAST DUE, please pay your balance at your soonest convenience.

Fees

			Rate	Hours	
12/02/2019	AE	Book court reporter for Curtis Child deposition		0.20	NO CHARGE
	AE	Begin updating PI deposition outline with exhibits	300.00	0.40	120.00
	AE	Attend deposition of Carmen Disavio-Watson at opposing counsel's office	300.00	3.80	1,140.00
	BS	Receive and review email [REDACTED]	575.00	0.20	115.00
	JWF	Meeting [REDACTED]		0.50	NO CHARGE
	JWF	Email to client [REDACTED] set Wednesday meeting	400.00	0.20	80.00
	JWF	Messages [REDACTED]		0.20	NO CHARGE
	JWF	Review reply in support of motion for protective order.		0.30	NO CHARGE
	JWF	Review [REDACTED]		0.20	NO CHARGE
12/03/2019	AE	Finalize and process 8th supplemental disclosure		0.20	NO CHARGE
	AE	Finish updates to PI deposition outline	300.00	1.70	510.00
	AE	Make updates to draft of pre-trial memorandum based on events since October	300.00	0.60	180.00
12/04/2019	AE	Meeting with client [REDACTED]	300.00	1.00	300.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/02/2020
Statement No. 53949
Page No. 2

			Rate	Hours	
	AE	Begin preparing 2nd supplemental responses to interrogatories and requests for production	300.00	1.10	330.00
	AE	Prepare exhibits for deposition of private investigator	300.00	0.50	150.00
	JWF	Telephone call [REDACTED] [REDACTED]	400.00	0.20	80.00
12/05/2019	AE	Prepare reply to opposition to motion for custody evaluation	300.00	1.00	300.00
	BS	Exchange emails [REDACTED] [REDACTED] Receive and review email from Mayo regarding change of hearing.	575.00	0.20	115.00
	BS	Receive and review opposition to motion for custody evaluation; Review, revise and supplement reply to child custody evaluation.	575.00	0.60	345.00
	JWF	Review letter [REDACTED] [REDACTED]		0.20	NO CHARGE
12/06/2019	AIR	Correspondence [REDACTED] [REDACTED]		0.20	NO CHARGE
	AE	Revisions to reply to opposition to motion for custody evaluation; phone call [REDACTED] phone call with opposing counsel regarding: motion to compel; prepare exhibits to reply; prepare supplemental declaration to reply; email to client [REDACTED]	300.00	2.00	600.00
	AE	Update 12/6/19 hearing outline; [REDACTED] review trial subpoenas	300.00	0.70	210.00
	AE	Continue preparing 2nd supplemental responses to interrogatories and requests for production; continue preparing amended financial disclosure form; review bank statements for both parties; update marital balance sheet	300.00	1.80	540.00
	AE	Prepare notice to vacate Michael Solinger deposition		0.20	NO CHARGE
	JWF	Prepare for discovery hearing.	400.00	0.50	200.00
	JWF	Attend discovery hearing; draft email to client [REDACTED]	400.00	1.50	600.00
12/07/2019	BS	Prepare for hearing(fees and custody evaluation); Review deposition outline for private investigator.	575.00	1.25	718.75
12/08/2019	JWF	[REDACTED]	400.00	2.00	800.00
	JWF	Review email from V. Mayo regarding alleged video of children in Adam's care.	400.00	0.20	80.00
12/09/2019	AE	Attend hearing with B. Shapiro and client		1.50	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/02/2020
Statement No. 53949
Page No. 3

		Rate	Hours	
12/10/2019	AE	Meet with client post-hearing [REDACTED] [REDACTED]	300.00	0.30 90.00
	AE	Review videos sent by opposing counsel pertaining to responses to requests for production; redact November 2019 billing statement and add to 9th disclosure; add letter from Michael Solinger attorney to 9th disclosure; continue preparing supplemental discovery responses	300.00	0.90 270.00
	AE	Begin preparing [REDACTED]	300.00	0.50 150.00
	BS	Receive and review email from Mayo regarding incident; Prepare for hearing; Court appearance (fees and custody evaluation); Exchange emails [REDACTED]	575.00	2.80 1,610.00
	JWF	Deposition of Private Investigator	400.00	1.70 680.00
	AIR	Meeting with client [REDACTED] [REDACTED]	180.00	0.40 72.00
	AE	Meet with client [REDACTED] continue preparing supplemental discovery responses	300.00	0.70 210.00
	AE	Begin review of 12/9/19 hearing video and preparation of order	300.00	1.10 330.00
	AE	Vacate deposition of Curtis Child; phone call [REDACTED] [REDACTED] emails with client [REDACTED]		0.40 NO CHARGE
	BS	Receive and review correspondence from Mayo regarding insurance; Email to Mayo regarding insurance and evaluation.	575.00	0.20 115.00
	BS	Receive and review objection to authenticity from Mayo.		NO CHARGE
	BS	Receive and review email from Mayo regarding letter.		NO CHARGE
	BS	Exchange emails with client [REDACTED]	575.00	0.20 115.00
	BS	Review [REDACTED] Draft email to send to client.		NO CHARGE
	JWF	Review client supplemental discovery responses (Interrogatories only)		0.30 NO CHARGE
12/11/2019	AIR	Correspondence to client [REDACTED] [REDACTED]	180.00	0.20 36.00
	AE	Emails with client [REDACTED]	300.00	0.20 60.00
	AE	Review Plaintiff's 9th supplemental disclosure, including videos	300.00	0.30 90.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/02/2020
Statement No. 53949
Page No. 4

			Rate	Hours	
	BS	Receive and review email from Department I regarding order.			NO CHARGE
12/12/2019	AIR	Preparation of Notice of Vacating Deposition of Abrams & Mayo Law Firm; and service of same on opposing counsel.	180.00	0.20	36.00
	AE	Emails with client [REDACTED] phone call [REDACTED] [REDACTED]	300.00	0.50	150.00
	BS	Prepare correspondence to V. Mayo regarding child custody evaluation.	575.00	0.20	115.00
12/13/2019	AE	Emails with client [REDACTED] finish review of 12/9/19 hearing and preparation of order; email to opposing counsel with 12/9/19 order for review and signature	300.00	1.10	330.00
	AIR	Preparation of Defendant's 9th set of NRCP 16.2 Disclosures and Witness List, including compiling, redacting, and Bates numbering of all documents; Revise and finalize Defendant's 2nd supplemental responses to Plaintiffs 1st set of Requests for Interrogatories and Production of Documents; and service of all documents on opposing counsel. (2.5 hours spent)	180.00	1.50	270.00
	BS	Review proposed order from 12.9.19 hearing.			NO CHARGE
	BS	Receive and review [REDACTED] Draft response to client.			NO CHARGE
	BS	Exchange emails [REDACTED]	575.00	0.20	115.00
	BS	Telephone conference [REDACTED]	575.00	0.20	115.00
12/15/2019	AE	Prepare [REDACTED]	300.00	0.25	75.00
12/16/2019	BS	Receive and review email [REDACTED] Email to client.	575.00	0.20	115.00
12/17/2019	AE	Review and respond to client email [REDACTED] prepare letter to opposing counsel regarding: support, fees, evaluation, etc.	300.00	0.40	120.00
	BS	Exchange emails with client [REDACTED] [REDACTED]	575.00	0.20	115.00
12/18/2019	AE	Review and respond to client email [REDACTED] prepare objection to 9th supplemental disclosure	300.00	0.40	120.00
	BS	Receive and review correspondence from Mayo dated 12.18.19 objecting to authenticity.			NO CHARGE
12/19/2019	AE	Review Robert Escalera deposition transcript	300.00	0.60	180.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/02/2020
Statement No. 53949
Page No. 5

			Rate	Hours	
	AE	Review and respond to email from opposing counsel regarding: order; phone call to client [REDACTED]	300.00	0.40	120.00
12/20/2019	AE	Prepare letter to opposing counsel regarding: deposition fees; email [REDACTED] [REDACTED] emails with client [REDACTED] revisions to [REDACTED] and marital balance sheet	300.00	1.30	390.00
	AE	Phone call and texts [REDACTED]	300.00	0.20	60.00
	BS	Receive and review correspondence from V. Mayo regarding insurance; Email to S. Stoltz regarding lack of communication.	575.00	0.20	115.00
12/23/2019	BS	Exchange emails with client [REDACTED]			NO CHARGE
	BS	Exchange emails with client [REDACTED]			NO CHARGE
	BS	Exchange emails [REDACTED]			NO CHARGE
12/24/2019	BS	Telephone conference [REDACTED]		0.60	NO CHARGE
12/29/2019	AE	Review Plaintiff's motion for reconsideration and prepare opposition	300.00	1.50	450.00
12/30/2019	BS	Receive and review notices to vacate trial subpoenas.	575.00	0.20	115.00
	BS	Review motion for reconsideration; Review, revise and supplement opposition; Email to client.	575.00	0.50	287.50
	BS	Exchange emails with client [REDACTED] [REDACTED]			NO CHARGE
	BS	Receive and review subpoena from Mayo to Metro.	575.00	0.20	115.00
12/31/2019	BS	Receive and review email from client [REDACTED] [REDACTED] Email to client; Exchange emails with client [REDACTED] [REDACTED] Review file for order; Email to Mayo; Exchange emails with Mayo; Additional email exchanges.	575.00	0.50	287.50
	BS	January 1- Exchange emails with client and Mayo [REDACTED] [REDACTED]	575.00	0.40	230.00
		For Current Services Rendered		42.30	15,367.75

Expenses

11/27/2019	Filing Fee.	3.50
12/06/2019	Filing Fee.	3.50
12/07/2019	Filing Fee.	3.50
12/09/2019	Process Server. John Wilks Process Serving	48.00
12/09/2019	Process Server. Carson Messenger Service Reno	85.00
12/17/2019	Miscellaneous. Federal Express to Reno Carson Messenger for service of subpoena	71.95

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/02/2020
Statement No. 53949
Page No. 6

12/17/2019	Transcript. Depo International for Jessica Sellers transcript.	516.25
12/18/2019	Transcript. Western Reporting Services, Inc. of Carmen Disavio-Watson	508.65
12/23/2019	Transcript. Depo International Robert Escalera	812.30
	Total Expenses	<u>2,052.65</u>
	Total Amount of this Bill	17,420.40
	Previous Balance	\$2,814.93
	Interest on overdue balance	16.66
	Balance Due	<u>\$20,251.99</u>
	Please Remit	<u>\$20,251.99</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after December 31, 2019 may not be reflected on this statement.

3. Payments Received after December 31, 2019 may not be reflected on this statement.

003672

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger

Statement Date: January 30, 2020
Statement No. 54164
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
01/02/2020	AE	Review emails from client; revise opposition to motion for reconsideration to add counter motion; emails with client [REDACTED]	300.00	1.70	510.00
	AE	Prepare objection to Plaintiff's memorandum of fees	300.00	0.80	240.00
	BS	Review, revise and supplement opposition for rehearing and counter motion.	575.00	0.30	172.50
01/03/2020	AE	Review opposing counsel's requested changes to order; respond to opposing counsel's email regarding: same	300.00	0.40	120.00
	AE	Prepare documents received from Michael Solinger pursuant to subpoena for disclosure; prepare 10th supplemental disclosure; finalize and process same	300.00	0.60	180.00
	AE	Prepare documents [REDACTED]	300.00	1.00	300.00
	BS	Receive and review email and proposed no contact order from Mayo; Email [REDACTED] Email to client [REDACTED]	575.00	0.30	172.50
01/05/2020	BS	Receive and review correspondence [REDACTED] Exchange emails with client [REDACTED]	575.00	0.50	287.50
01/06/2020	AE	Prepare letter to opposing counsel regarding: objection and drone; begin [REDACTED] [REDACTED] review hearing video regarding: no-contact order	300.00	1.50	450.00
01/07/2020	BS	Receive and review email [REDACTED]			NO CHARGE
	BS	Receive and review email from Dept. regarding settlement			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/30/2020
Statement No. 54164
Page No. 2

			Rate	Hours	
		conference; Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS	Receive and review correspondence from V. Mayo dated 1.7.2020 regarding letter from Schneider.	575.00	0.20	115.00
01/08/2020	AIR	Preparation of Notice of Vacating Trial Subpoena of Jessica Sellers; submission of same to District Court for filing; and service on counsel.	180.00	0.20	36.00
01/09/2020	AE	Revisions to proposed order from 12/9/19 hearing; email to opposing counsel regarding: same	300.00	0.20	60.00
	BS	Telephone [REDACTED]			NO CHARGE
	AE	Email to client [REDACTED]	300.00	0.20	60.00
	BS	Exchange emails [REDACTED]			NO CHARGE
01/10/2020	AE	Review email from client [REDACTED] [REDACTED] email to client [REDACTED]	300.00	0.20	60.00
	FIR	Correspondence to Client			NO CHARGE
	FIR	Correspondence to Client			NO CHARGE
	JWF	Review [REDACTED]	400.00	0.20	80.00
	AE	Prepare, finalize and process letter to opposing counsel regarding: no-contact order	300.00	0.30	90.00
01/13/2020	FIR	Correspondence to client			NO CHARGE
01/14/2020	FIR	Correspondence to client			NO CHARGE
	BS	Email to client [REDACTED]	575.00	0.20	115.00
	BS	Exchange emails with client [REDACTED]	575.00	0.20	115.00
	BS	Email [REDACTED]			NO CHARGE
	FIR	Correspondence to client			NO CHARGE
	AE	Prepare, finalize, and process objection to 10th disclosure	300.00	0.20	60.00
01/15/2020	BS	Exchange emails with client; Exchange emails [REDACTED] [REDACTED]			NO CHARGE
01/17/2020	AE	Continue preparing [REDACTED]	300.00	0.90	270.00
01/22/2020	BS	Outline motion to withdraw.			NO CHARGE
	FIR	Correspondence to client			NO CHARGE

003674

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/30/2020
Statement No. 54164
Page No. 3

			Rate	Hours	
	AE	Prepare motion to withdraw as attorney of record	300.00	0.40	120.00
01/23/2020	FIR	Correspondence to client			NO CHARGE
	FIR	Correspondence to client			NO CHARGE
	BS	Email to client [REDACTED]			NO CHARGE
01/24/2020	FIR	Correspondence to client.			NO CHARGE
	FIR	Correspondence to client			NO CHARGE
01/25/2020	BS	Receipt and review Adam's reply and exhibits for reply.	575.00	0.30	172.50
	BS	Receipt and review Report and Recommendations filed January 23, 2020.			NO CHARGE
01/27/2020	BS	Telephone [REDACTED]			NO CHARGE
	BS	Email to client [REDACTED]			NO CHARGE
01/28/2020	BS	Exchange emails [REDACTED]			NO CHARGE
	AE	Email to opposing counsel regarding: outstanding order	300.00	0.20	60.00
	AR	E-serve notice of hearing; prepare certificate of service to Chalese; [REDACTED]			
		[REDACTED] prepare certificate of service to Mayo.	180.00	0.50	90.00
01/29/2020	AE	Review email from opposing counsel regarding: requested change to 12/9/19 order; revise order accordingly; email to opposing counsel regarding: same	300.00	0.20	60.00
		For Current Services Rendered		11.90	4,111.00

Expenses

01/03/2020	Filing Fee.	3.50
01/03/2020	Filing Fee.	3.50
01/08/2020	Filing Fee.	3.50
01/27/2020	Filing Fee.	3.50
01/28/2020	Filing Fee.	3.50
01/28/2020	Filing Fee.	3.50
	Total Expenses	21.00
	Total Amount of this Bill	4,132.00
	Previous Balance	\$20,251.99

003675

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/30/2020
Statement No. 54164
Page No. 4

Payments

01/08/2020	Payment -from Mayo	-660.00
	Interest on overdue balance	141.44
	Balance Due	<u>\$23,865.43</u>
	Please Remit	<u>\$23,865.43</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after January 29, 2020 may not be reflected on this statement.

3. Payments Received after January 29, 2020 may not be reflected on this statement.

PECOS LAW GROUP

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(702) 388-1851

Chalese Solinger

Statement Date: February 28, 2020

Statement No. 54389

Account No. 1896.00

Page: 1

RE: Divorce

Fees

			Rate	Hours	
01/30/2020	AIR	Preparation of Request for Submission of Motion to Withdraw as Counsel of Record, as well as the proposed Order to Withdraw as counsel of record.	180.00	0.40	72.00
02/03/2020	AE	Finalize and submit order on 12/9/19 hearing	300.00	0.20	60.00
02/07/2020	BS	Exchange multiple emails [REDACTED]		0.30	NO CHARGE
02/08/2020	BS	Exchange emails with client [REDACTED]		0.20	NO CHARGE
02/10/2020	AE	Review Plaintiff's 11th supplemental disclosure; prepare authenticity objection regarding: same	300.00	0.20	60.00
02/11/2020	AE	Finalize and process authenticity objection regarding: Plaintiff's 11th supplemental disclosure	300.00	0.20	60.00
02/12/2020	BS	Email to client [REDACTED]		0.20	NO CHARGE
	BS	Receive and review notice of non-opposition from V. Mayo.		0.20	NO CHARGE
02/14/2020	BS	Receive and review court minutes regarding objection hearing.	575.00	0.20	115.00
02/19/2020	AIR	Correspondence [REDACTED]	180.00	0.20	36.00
		For Current Services Rendered		1.40	403.00

Expenses

02/06/2020	Filing Fee.	NO CHARGE
02/07/2020	Filing Fee.	NO CHARGE
02/12/2020	Filing Fee.	NO CHARGE
02/20/2020	Filing Fee.	NO CHARGE

Total Amount of this Bill

403.00

003677

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 02/28/2020
Statement No. 54389
Page No. 2

Previous Balance before Adjustments \$23,865.43

02/27/2020 Courtesy Credit. -11,932.72

Previous Balance \$11,932.71

Payments

02/11/2020 Payment -thank you -11,932.71

Courtesy Credit -403.00

Balance Due \$0.00

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after January 29, 2020 may not be reflected on this statement.

3. Payments Received after January 29, 2020 may not be reflected on this statement.

003678

PECOS LAW GROUP

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Henderson, NV 89074

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(702) 388-1851

Chalese Solinger

Statement Date:

April 24, 2020

Statement No.

54833

Account No.

1896.00

Page: 1

RE: Divorce

Fees

			Rate	Hours	
03/25/2020	KK	Reviewed discovery orders pertaining to Josh's deposition; Draft email to client [REDACTED]	350.00	0.40	140.00
03/27/2020	KK	Review emails from client [REDACTED] Draft email to opposing counsel regarding request to have client allow phone contact. Draft email to client [REDACTED]	350.00	0.30	105.00
	KK	Review Plaintiff's 12th 16.2 disclosures pg.1-296.	350.00	1.30	455.00
04/02/2020	JWF	Review and revise initial draft of opposition to motion set on Order shortening time.	400.00	0.30	120.00
	AIR	Correspondence to client [REDACTED]		0.20	NO CHARGE
	AIR	Revise and finalize Opposition and Countermotion, as well as the Substitution of Attorneys; teleconference with client [REDACTED] submission of both to District Court for filing; and service on opposing counsel.	180.00	0.50	90.00
	AE	Prepare notice of association of counsel		0.20	NO CHARGE
	AE	Review emergency motion for change of custody; phone call with client [REDACTED] prepare opposition to motion and countermotion for order to show cause et al.	300.00	3.10	930.00
	AE	Revisions to opposition to motion for change of custody and countermotion for order to show cause et al.; emails with client [REDACTED]		0.60	NO CHARGE
04/03/2020	AIR	Teleconference and correspondence [REDACTED]		0.20	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 04/24/2020
Statement No. 54833
Page No. 2

			Rate	Hours	
	AIR	Teleconference with client and correspondence with client [REDACTED]		0.20	NO CHARGE
	AE	Review and respond to email from client [REDACTED] [REDACTED]		0.20	NO CHARGE
04/06/2020	JWF	Prepare for Hearing.	400.00	1.80	720.00
	JWF	Attend video hearing.	400.00	1.10	440.00
	JWF	Emails with client [REDACTED]	400.00	0.30	120.00
	JWF	Review proposed order; emails with opposing counsel.	400.00	0.50	200.00
	AE	Review Plaintiff's 13th disclosure, including videos; p [REDACTED] [REDACTED]	300.00	0.80	240.00
04/07/2020	JWF	Review [REDACTED] [REDACTED]	400.00	0.70	280.00
04/08/2020	JWF	Emails with client.	400.00	0.30	120.00
	JWF	Review notes for Motion on Order to show cause Hearing.		0.30	NO CHARGE
	AE	Prepare outline for hearing on Plaintiff's motion for order to show cause		0.70	NO CHARGE
04/09/2020	AIR	Correspondence to client [REDACTED] [REDACTED]	180.00	0.20	36.00
	AIR	Receive, review and download of Plaintiff's 13th set of 16.2 Disclosures and List of Witnesses; and correspondence to client [REDACTED]	180.00	0.40	72.00
	AIR	Preparation of initial draft of Defendant's 11th set of NRCP 16.2 Disclosures and Witness List.	180.00	0.40	72.00
	JWF	Review Second Set of Exhibits and Video from opposing counsel.	400.00	0.30	120.00
	JWF	Email to client [REDACTED]	400.00	0.20	80.00
04/10/2020	AIR	Finalize Defendant's 11th set of NRCP 16.2 Disclosures and Witness List; and service of same on opposing counsel.	180.00	0.20	36.00
04/12/2020	AE	Prepare for April 13, 2020 hearing; phone call with client [REDACTED] emails with client [REDACTED] review Plaintiff's supplemental exhibits	300.00	1.90	570.00
	AE	Prepare, finalize, and process objection to Plaintiff's 12th and 13th disclosures		0.20	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

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			Rate	Hours	
04/13/2020	AIR	Correspondence [REDACTED] [REDACTED]		0.20	NO CHARGE
	JWF	Prepare for hearing.	400.00	0.50	200.00
	JWF	Attend hearing.	400.00	2.60	1,040.00
	JWF	Emails with client [REDACTED]	400.00		0.00
	AE	Attend video hearing with J. Fleeman on Plaintiff's motion for order to show cause and motion to modify custody and our counter-motion for order to show cause et al.		2.50	NO CHARGE
04/14/2020	BS	Email [REDACTED]		0.20	NO CHARGE
	JWF	Review [REDACTED] emails with client [REDACTED] [REDACTED]	400.00	0.50	200.00
04/15/2020	AIR	Receive and review [REDACTED] [REDACTED] and correspondence to Judge and opposing counsel [REDACTED]	180.00	0.40	72.00
	AIR	Correspondence to Judge's chambers enclosing the proposed Order to Show Cause for her review and execution.		0.20	NO CHARGE
	JWF	Emails [REDACTED] [REDACTED]	400.00	0.20	80.00
	AE	Begin review of 2/26/2020 hearing video and proposed order from opposing counsel	300.00	1.40	420.00
	AE	Prepare order to show cause	300.00	0.40	120.00
04/16/2020	AIR	Correspondence [REDACTED] [REDACTED]		0.20	NO CHARGE
	AIR	Preparation of Defendant's 12th set of NRCP 16.2 Disclosures and Witness List; and service of same on opposing counsel via e-service and regular mail.	180.00	0.75	135.00
	JWF	Emails with client [REDACTED] [REDACTED].	400.00	0.50	200.00
	AE	Phone call with client [REDACTED]		0.20	NO CHARGE
	AE	Prepare letter to opposing counsel regarding: visitation over weekend; email to opposing counsel regarding: review of 2/26/2020 order; continue review of same	300.00	0.50	150.00
04/17/2020	AE	Finalize and process letter to opposing counsel regarding: visitation and support; review responsive letter		0.20	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 04/24/2020
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			Rate	Hours	
04/19/2020	JWF	Emails with client [REDACTED]			
		[REDACTED]	400.00	0.20	80.00
	AE	Finish review of 2/26/2020 hearing video and review of order; finish letter to opposing counsel regarding: same	300.00	0.30	90.00
04/20/2020	AE	Finalize and process letter to opposing counsel regarding: 2/26/2020 order; review letter from opposing counsel regarding: cutting hair & painting nails; email to client [REDACTED]		0.30	NO CHARGE
04/21/2020	JWF	Revisions to Letter to Mayo regarding missing support and insurance.		0.30	NO CHARGE
	AE	Emails with client [REDACTED] prepare letter to opposing counsel regarding: same	300.00	0.20	60.00
04/22/2020	JWF	Review emails from court and Mayo regarding outstanding orders.	400.00	0.20	80.00
	AE	Revise letter to opposing counsel regarding: support and health insurance; emails with client [REDACTED] finalize and process same	300.00	0.20	60.00
04/23/2020	AE	Phone call with client [REDACTED] multiple emails with client and opposing counsel [REDACTED] prepare letter to opposing counsel regarding: same	300.00	1.00	300.00
	AE	Email to client [REDACTED]	300.00	0.20	60.00
	AIR	Submission of correspondence to opposing counsel for e-service. For Current Services Rendered	180.00	0.20	36.00
				25.25	8,329.00

Expenses

04/03/2020	Filing Fee.	3.50
04/03/2020	Filing Fee.	3.50
	Total Expenses	7.00

Total Amount of this Bill 8,336.00

Payments

04/24/2020	Payment	-8,336.00
	Balance Due	<u>\$0.00</u>

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Chalese Solinger
Account No. 1896.00
RE: Divorce

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Page No. 5

Trust Account

	Previous Balance in Trust	\$0.00
04/21/2020	Transferred from vwa-Solinger	17,379.00
04/24/2020	Payment	
	PAYEE: Pecos Law Group	-8,336.00
	Remaining Balance in Trust	<u>\$9,043.00</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after April 23, 2020 may not be reflected on this statement.

3. Payments Received after April 23, 2020 may not be reflected on this statement.

003683

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger

Statement Date:

May 26, 2020

Statement No.

55071

Account No.

1896.00

Page: 1

RE: Divorce

Fees

			Rate	Hours	
04/24/2020	AE	Review emails from client [REDACTED] [REDACTED] emails to opposing counsel regarding: make-up visitation request	300.00	0.30	90.00
	AE	Prepare emergency motion for make-up visitation time et al.	300.00	2.10	630.00
	AIR	Receive and review correspondence from opposing counsel regarding miscellaneous issues pertaining to the children.		0.20	NO CHARGE
	AIR	Correspondences to client [REDACTED] [REDACTED]		0.20	NO CHARGE
04/26/2020	AE	Review 2/26/2020 hearing video regarding: health insurance cost and division, etc.; begin preparing motion for order to show cause regarding: health insurance	300.00	1.40	420.00
	AE	Phone call with client [REDACTED] review 4/24/2020 letter from opposing counsel; revise and add facts to draft emergency motion for make-up visitation time et al.; emails with client [REDACTED]	300.00	2.00	600.00
04/27/2020	AE	Review Plaintiff's motion to retain sick children et al.; prepare opposition to same; modify motion for make-up visitation time et al. to countermotion	300.00	2.40	720.00
	AE	Revisions to opposition to motion to retain sick children et al. and countermotion; begin preparing exhibits for same	300.00	0.80	240.00
	AE	Review letter from opposing counsel regarding: Josh Lloyd deposition; prepare response to same	300.00	0.20	60.00
	AE	Phone call with client [REDACTED] finalize and process letter to opposing counsel regarding: same	300.00	0.20	60.00

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 05/26/2020
 Statement No. 55071
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			Rate	Hours	
04/28/2020	AE	Further revisions to opposition to motion to retain sick children et al. and countermotion for make-up visitation et al.; email to client [REDACTED]	300.00	0.20	60.00
	AE	Further revisions to opposition to motion to retain sick children et al. and countermotion for make-up visitation et al.; finish preparing exhibit addendum; finalize and process same		0.70	NO CHARGE
	AE	Continue preparing motion for order to show cause regarding: health insurance	300.00	2.30	690.00
	JWF	Review and revise opposition		1.70	NO CHARGE
04/29/2020	AIR	Preparation of Ex Parte Application for Order Shortening Time, as well as the proposed Order Shortening Time.	180.00	0.50	90.00
	AE	Prepare second letter to opposing counsel regarding: Josh Lloyd deposition	300.00	0.20	60.00
	AE	Review letter from opposing counsel regarding: camping, prepare response		0.20	NO CHARGE
	AE	Phone call with client [REDACTED]		0.20	NO CHARGE
04/30/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
	AE	Prepare letter to opposing counsel regarding: Josh Lloyd deposition		0.20	NO CHARGE
	AE	Continue preparing motion for order to show cause regarding: health insurance and letter to opposing counsel regarding: same; emails with client [REDACTED]	300.00	0.50	150.00
	AIR	E-serve correspondence to opposing counsel.		0.20	NO CHARGE
05/03/2020	AE	Finish preparing letter [REDACTED]	300.00	1.80	540.00
05/04/2020	AE	Continue preparing motion for order to show cause regarding: health insurance	300.00	0.70	210.00
	JWF	Review client email [REDACTED]	400.00	0.20	80.00
05/05/2020	AE	Emails with client [REDACTED]	300.00	0.20	60.00
	AE	Prepare letter to opposing counsel regarding: Governor's directives; revisions to letter; emails with client [REDACTED]	300.00	0.50	150.00
	AE	Add request for clarification of order regarding: quarantine to motion for order to show cause; finish draft of motion for order to show cause	300.00	1.50	450.00

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

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 Statement No. 55071
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			Rate	Hours	
	JWF	Emails with client [REDACTED] [REDACTED] revisions to letter to V. Mayo	400.00	1.70	680.00
05/06/2020	AE	Review emails from client; revise, finalize, and process letter to opposing counsel regarding: Governor's directives		0.30	NO CHARGE
	AE	Begin preparing competing order on 2/26/2020 hearing		0.90	NO CHARGE
	AE	Finish preparing documents and letter [REDACTED]	300.00	0.50	150.00
	AE	Prepare subpoenas to Bank of America and ADP; prepare notice of subpoenas; finalize and process notice of subpoenas	300.00	0.70	210.00
	AE	Begin updating pre-trial memorandum and trial brief	300.00	0.60	180.00
	JWF	Emails with client [REDACTED] [REDACTED]	400.00	0.60	240.00
05/07/2020	AE	Continue preparing competing order on 2/26/2020 hearing		1.00	NO CHARGE
	JWF	Emails with client [REDACTED] [REDACTED]	400.00	0.70	280.00
	JWF	Review proposed court order with changes.		0.30	NO CHARGE
05/08/2020	AE	Review letters from opposing counsel sent 5/7/2020 (three letters); review revised order on 2/26/2020 hearing, compare with prior draft and review new video cites	300.00	0.40	120.00
	JWF	Discussions [REDACTED] [REDACTED]		0.50	NO CHARGE
05/10/2020	AE	Revisions to motion for order to show cause regarding: health insurance per recent updates	300.00	1.40	420.00
	AE	Begin preparing updated financial disclosure form; email to client [REDACTED]		0.30	NO CHARGE
	JWF	Review and revise motion for OSC		0.90	NO CHARGE
05/12/2020	AE	Further revisions to motion for order to show cause regarding: health insurance; email to client [REDACTED]		0.50	NO CHARGE
	AE	Emails [REDACTED]	300.00	0.20	60.00
05/13/2020	AE	Phone call [REDACTED]	300.00	0.30	90.00
	AE	Review email from client; revise motion for order to show cause regarding: health insurance	300.00	0.20	60.00
	AE	Prepare updated witness list and trial subpoenas	300.00	0.60	180.00
	AE	Begin preparing confidential settlement conference brief	300.00	1.00	300.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 05/26/2020
Statement No. 55071
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			Rate	Hours	
	JWF	Discussions [REDACTED] [REDACTED]		0.70	NO CHARGE
05/14/2020	AE	Finalize subpoenas to Bank of America and ADP for service		0.20	NO CHARGE
05/15/2020	AE	Attend telephonic deposition of Josh Lloyd	300.00	2.00	600.00
	AE	Emails with client [REDACTED]	300.00	0.20	60.00
	JWF	Emails with client [REDACTED]	400.00	0.50	200.00
05/17/2020	AE	Email to client [REDACTED] [REDACTED]	300.00	0.20	60.00
	AE	Prepare exhibits to motion for order to show cause regarding: health insurance	300.00	0.20	60.00
05/18/2020	AE	Review emails from client [REDACTED] [REDACTED] further revisions to motion for order to show cause; continue preparing updated financial disclosure form	300.00	0.30	90.00
	JWF	Review client emails [REDACTED]		0.20	NO CHARGE
05/19/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
05/20/2020	AE	Review emails from client and letters from opposing counsel; emails to client [REDACTED] prepare responsive letter to opposing counsel	300.00	0.70	210.00
05/21/2020	AIR	Correspondence [REDACTED] [REDACTED]		0.20	NO CHARGE
	AE	Further revisions to motion for order to show cause regarding: health insurance; add photos and videos from client to 13th disclosure; emails to client [REDACTED] [REDACTED]	300.00	1.00	300.00
	JWF	Revisions to letter to opposing counsel and motion for OSC		0.30	NO CHARGE
05/22/2020	AE	Further revisions to updated financial disclosure form; email to client [REDACTED]		0.20	NO CHARGE
	AIR	Receipt and review of Plaintiff's 14th set of NRCP 16.2 Disclosures and Witness List.	180.00	0.20	36.00
	AIR	Correspondence to client [REDACTED] [REDACTED]		0.20	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 05/26/2020
Statement No. 55071
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		Rate	Hours	
	AIR	Preparation of video disclosures for production; and correspondence to opposing counsel enclosing the link to access the same.	180.00	0.40 72.00
	AE	Finalize and process letter to opposing counsel		0.20 NO CHARGE
	AE	Add new video sent by client to 13th disclosure; finalize and process 13th disclosure	300.00	0.20 60.00
	AE	Phone call [REDACTED]	300.00	0.20 60.00
	AE	Finalize and process motion for order to show cause regarding: health insurance, exhibits, and updated financial disclosure form		0.20 NO CHARGE
05/24/2020	AE	Finish review of 4/13/2020 order and hearing video; prepare letter to opposing counsel regarding: same; finalize and process letter	300.00	1.30 390.00
05/25/2020	AE	Review and respond to email from client [REDACTED]	300.00	0.20 60.00
	JWF	Review draft of settlement brief. For Current Services Rendered		0.50 NO CHARGE 35.10 10,788.00

Expenses

04/28/2020	Filing Fee.	3.50
05/23/2020	Filing Fee.	3.50
	Total Expenses	7.00
	Total Amount of this Bill	10,795.00

Payments

05/26/2020	Payment	-10,795.00
	Balance Due	<u>\$0.00</u>

Trust Account

	Previous Balance in Trust	\$9,043.00
05/04/2020	Payment- Solinger	9,043.00
05/26/2020	Payment	
	PAYEE: Pecos Law Group	-10,795.00
	Remaining Balance in Trust	<u>\$7,291.00</u>

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 05/26/2020
Statement No. 55071
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- 1. Please note your payment is due within 15 days from the date of this statement.**
- 2. Services rendered and cost incurred after May 25, 2020 may not be reflected on this statement.**
- 3. Payments Received after May 25, 2020 may not be reflected on this statement.**

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger

Statement Date:

June 26, 2020

Statement No.

55327

Account No.

1896.00

Page: 1

RE: Divorce

Fees

			Rate	Hours	
05/26/2020	AE	Prepare certificate of service for notice of hearing; serve notice of hearing and process certificate of service		0.20	NO CHARGE
	AE	Begin review of Adam's 14th supplemental disclosure	300.00	1.60	480.00
05/27/2020	AIR	Preparation of Notice of Entry of Order for the Order to Show Cause; submission of same to District Court for filing; and service on opposing counsel.	180.00	0.30	54.00
	AIR	Review Defendant's Motion for Order to Show Cause, et al.; and preparation of initial draft of the Ex Parte Application for Order Shortening Time.		0.80	NO CHARGE
	AIR	Preparation of Order Shortening Time.		0.20	NO CHARGE
05/28/2020	AE	Review ex parte application for order shortening time regarding: motion for order to show cause and revise same; email to client [REDACTED]	300.00	0.20	60.00
	AIR	Preparation of initial draft of Defendant's 14th set of NRCP 16.2 Disclosures and Witness List.	180.00	0.30	54.00
	AIR	Revise Defendant's Ex Parte Application for Order Shortening Time.		0.30	NO CHARGE
	AE	Review and revise ex parte application for order shortening time; add additional documents to 14th disclosure	300.00	0.70	210.00
	AE	Prepare pre-trial memorandum and updated marital balance sheet; revise settlement brief	300.00	1.70	510.00
	AE	Email to client [REDACTED]	300.00	0.20	60.00

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

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 Page No. 2

		Rate	Hours	
	AE	Continue review of Adam's 14th supplemental disclosure	300.00	0.60 180.00
	AE	Phone call [REDACTED] [REDACTED]	300.00	0.20 60.00
	AE	Prepare, finalize, and process authenticity objection to Adam's 14th supplemental disclosure	300.00	0.20 60.00
	JWF	Review and revise ex parte application for order shortening time.	400.00	0.30 120.00
	JWF	Review and revise settlement brief.	400.00	0.70 280.00
	JWF	Review [REDACTED]	400.00	0.30 120.00
	JWF	Email [REDACTED] [REDACTED]		0.30 NO CHARGE
05/29/2020	AIR	Preparation of formatting videos pertaining to social distancing at the lake and pool; and correspondence [REDACTED] [REDACTED]		0.40 NO CHARGE
	AE	Phone call and email [REDACTED] [REDACTED]		0.20 NO CHARGE
	AE	Prepare documents from client for disclosure; finish 14th supplemental disclosure; finalize and process same	300.00	0.40 120.00
	AE	Finish review of Adam's 14th disclosure; review Adam's 15th disclosure	300.00	0.60 180.00
	AE	Prepare for 6/1/2020 hearing		0.80 NO CHARGE
	AE	Email to client [REDACTED]	300.00	0.20 60.00
	AIR	Compile and format videos from Defendant's 14th set of NRCP 16.2 disclosures; and correspondence to opposing counsel enclosing the same.		0.30 NO CHARGE
05/31/2020	AE	Prepare, finalize, and process authenticity objection to Adam's 15th and 16th disclosures; review PI video disclosed by Adam	300.00	0.80 240.00
06/01/2020	AE	Phone call [REDACTED] [REDACTED] email to client [REDACTED]		0.20 NO CHARGE
	AE	Attend motion hearing	300.00	0.80 240.00
	AE	[REDACTED]		0.20 NO CHARGE
	AE	Review Josh Lloyd deposition transcript	300.00	0.30 90.00
	AE	[REDACTED]		0.40 NO CHARGE

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Chalese Solinger
Account No. 1896.00
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			Rate	Hours	
	AE	Prepare ex parte application for order to show cause; order to show cause; and schedule of support arrears	300.00	0.90	270.00
06/03/2020	AE	Prepare documents from Bank of America for disclosure; prepare, finalize, and process 15th supplemental disclosure	300.00	1.40	420.00
	AE	Review Adam's bank and credit card statements in detail; begin preparing updated trial exam for Adam	300.00	1.50	450.00
	AE	[REDACTED]		2.00	NO CHARGE
	AE	Begin preparing trial outline	300.00	0.30	90.00
	AIR	Correspondence [REDACTED]		0.20	NO CHARGE
	AIR	Correspondence to Judge's chambers enclosing the Order to Show Cause.		0.20	NO CHARGE
06/05/2020	AE	Phone call [REDACTED] phone call [REDACTED] [REDACTED] email to client	300.00	0.50	150.00
	AE	Phone call [REDACTED]		0.20	NO CHARGE
	AE	Review hearing video from 6/1/2020 hearing; prepare order on 6/1/2020 hearing	300.00	1.50	450.00
	JWF	Emails [REDACTED]		0.30	NO CHARGE
06/08/2020	AE	Review and respond to email from client [REDACTED]	300.00	0.20	60.00
	AE	Email [REDACTED]		0.20	NO CHARGE
06/09/2020	AE	Email to opposing counsel regarding: 6/1/2020 order	300.00	0.20	60.00
06/10/2020	AE	Update marital balance sheet; prepare [REDACTED]	300.00	0.70	210.00
06/11/2020	AE	Prepare trial subpoena [REDACTED] prepare letter to opposing counsel regarding: bank statements, etc.; review Adam's 16th disclosure	300.00	0.80	240.00
	JWF	Emails [REDACTED]		0.30	NO CHARGE
06/14/2020	AE	Prepare discovery index; continue preparing trial outline	300.00	3.10	930.00
06/15/2020	AE	Review Carmen Disavio-Watson deposition transcript	300.00	0.80	240.00
	AE	Finalize and process letter to opposing counsel regarding:			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 06/26/2020
Statement No. 55327
Page No. 4

			Rate	Hours	
		Adam's 401(k); review responsive letter; emails to client [REDACTED]		0.20	NO CHARGE
	AE	Phone call [REDACTED] [REDACTED] [REDACTED] continue preparing Adam's trial exam	300.00	1.40	420.00
	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
06/16/2020	AE	[REDACTED]	300.00	1.00	300.00
	AE	Prepare letter to opposing counsel regarding: continuing trial; finalize and process same	300.00	0.20	60.00
	JWF	[REDACTED]		0.40	NO CHARGE
06/17/2020	JWF	Email from court regarding continuance; Email to client [REDACTED] [REDACTED]	400.00	0.30	120.00
06/18/2020	AE	Email to client [REDACTED]		0.20	NO CHARGE
	JWF	[REDACTED]		0.50	NO CHARGE
06/19/2020	AE	Prepare letter with paystubs, finalize and process same	300.00	0.20	60.00
06/21/2020	AE	Review Adam's motion regarding: trial continuance; begin preparing opposition and countermotion to same	300.00	2.20	660.00
06/22/2020	AE	Email to client [REDACTED]		0.20	NO CHARGE
	AE	Finish draft of opposition and countermotion to Adam's motion regarding: trial continuance	300.00	0.40	120.00
	AE	Review letter from opposing counsel regarding: daycare; email to client [REDACTED]		0.20	NO CHARGE
	AIR	Correspondence to client [REDACTED] [REDACTED]		0.20	NO CHARGE
	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
06/23/2020	AE	Review and respond to email from client [REDACTED] [REDACTED]	300.00	0.20	60.00
	AE	Review letter from opposing counsel; emails with client [REDACTED] [REDACTED] prepare responsive letter; revisions to responsive letter	300.00	0.80	240.00
	JWF	Emails with client [REDACTED]	400.00	0.30	120.00
06/24/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 06/26/2020
Statement No. 55327
Page No. 5

		Rate	Hours	
	AE			
	Revisions to 6/1/2020 order; email to opposing counsel regarding: same	300.00	0.20	60.00
	AE			
	Review letter from opposing counsel regarding: picking up the children; phone call with client [REDACTED] prepare responsive letter; finalize and process same	300.00	0.40	120.00
06/25/2020	AE			
	Revisions to opposition to motion regarding: trial continuance; prepare exhibits to same	300.00	1.60	480.00
	AE			
	Prepare, finalize, and process letter to opposing counsel regarding: order to show cause issues	300.00	0.20	60.00
	JWF			
	Emails with opposing counsel regarding communicating with court.	400.00	0.20	80.00
	JWF			
	Revisions to opposition to motion to address trial dates.	400.00	1.20	480.00
	For Current Services Rendered		33.70	10,408.00

Expenses

05/26/2020	Filing Fee.	3.50
05/28/2020	Filing Fee.	3.50
06/03/2020	Filing Fee.	3.50
06/07/2020	Transcript. Western Reporting Services, Inc.	297.75
06/07/2020	Miscellaneous. Bank of America	43.50
06/07/2020	Filing Fee.	3.50
[REDACTED]	[REDACTED]	[REDACTED]
06/16/2020	Witness Fee. Jessica Sellers	39.00
	Total Expenses	708.25
	Total Amount of this Bill	11,116.25

Payments

06/26/2020	Payment	-11,116.25
	Balance Due	<u>\$0.00</u>

Trust Account

	Previous Balance in Trust	\$7,291.00
06/15/2020	Additional Payment- Solinger	7,291.00
06/26/2020	Payment	
	PAYEE: Pecos Law Group	-11,116.25
	Remaining Balance in Trust	<u>\$3,465.75</u>

003694

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 06/26/2020
Statement No. 55327
Page No. 6

- 1. Please note your payment is due within 15 days from the date of this statement.**
- 2. Services rendered and cost incurred after May 25, 2020 may not be reflected on this statement.**
- 3. Payments Received after May 25, 2020 may not be reflected on this statement.**

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger

Statement Date:

July 27, 2020

Statement No.

55605

Account No.

1896.00

Page: 1

RE: Divorce

Fees

			Rate	Hours	
06/26/2020	AE	Further revisions to opposition to motion regarding: trial continuance; email to client [REDACTED]	300.00	0.20	60.00
	AE	Review stipulation and order regarding: order to show cause issues from opposing counsel; sign and return same	300.00	0.20	60.00
	AE	Finalize and process opposition to motion regarding: trial continuance and exhibits to same		0.20	NO CHARGE
06/29/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
06/30/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
	AE	[REDACTED]	300.00	0.50	150.00
	JWF	Prepare for hearing.	400.00	0.50	200.00
	JWF	Attend hearing.	400.00	3.30	1,320.00
07/01/2020	AIR	Correspondence to transcript video services requesting the video from the June 30, 2020 hearing.	180.00	0.20	36.00
07/02/2020	AE	Submit order on 6/1/2020 hearing to Department I		0.20	NO CHARGE
	JWF	[REDACTED]		0.30	NO CHARGE
07/03/2020	JWF	Emails with opposing counsel regarding withdraw from case and opposing party self-representation.	400.00	0.30	120.00
07/04/2020	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
07/06/2020	AE	Review emails from client [REDACTED] prepare documents regarding: Michael's broken arm and Marie's bruises			

003696

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 07/27/2020
Statement No. 55605
Page No. 2

		Rate	Hours	
	for disclosure; begin preparing 16th supplemental disclosure	300.00	0.40	120.00
AE	[REDACTED]	300.00	0.75	225.00
AE	[REDACTED] emails with client [REDACTED]	300.00	0.90	270.00
AE	Prepare, finalize, and process notice of entry of 6/1/2020 order		0.20	NO CHARGE
AIR	Preparation of initial draft of the Order from the June 30, 2020 hearing.	180.00	0.80	144.00
JWF	Review report.		0.40	NO CHARGE
JWF	Emails with client [REDACTED]	400.00	0.30	120.00
07/07/2020	AIR			
	Review, revise and finalize proposed Order from the June 30, 2020 hearing; and preparation of correspondence to opposing counsel enclosing the same for his review and execution.		0.30	NO CHARGE
07/08/2020	AE			
	Phone call to opposing counsel (left voicemail); prepare, finalize and process letter to opposing counsel regarding: client's sister picking up the children; phone call with opposing party regarding: same (with opposing counsel's permission to contact directly); email to opposing counsel and opposing party regarding: same	300.00	0.40	120.00
	JWF			
	Emails and discussions with client and opposing counsel and opposing party [REDACTED].	400.00	0.75	300.00
07/10/2020	AE			
	[REDACTED] prepare letter to opposing counsel regarding: doctor's note and transportation issues; email to client [REDACTED] finalize and process letter to opposing counsel	300.00	0.40	120.00
	JWF			
	[REDACTED]		0.30	NO CHARGE
07/13/2020	AE			
	Review email from opposing counsel with stipulation and order to withdraw; sign stipulation; respond to email from opposing counsel with signed stipulation	300.00	0.20	60.00
	AE			
	Email to client [REDACTED]	300.00	0.20	60.00
	AE			
	[REDACTED]	300.00	0.20	60.00
07/14/2020	AE			
	[REDACTED]	300.00	1.70	510.00
	AE			
	Phone call [REDACTED]	300.00	0.20	60.00
	AE			
	Phone call [REDACTED]			

003697

Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 07/27/2020
 Statement No. 55605
 Page No. 3

			Rate	Hours	
		[REDACTED] Phone call	300.00	0.20	60.00
07/15/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
	AE	Review and respond to email from client [REDACTED]	300.00	0.20	60.00
	AE	Phone call [REDACTED] and email [REDACTED]	300.00	0.20	60.00
	AE	[REDACTED]	300.00	1.20	360.00
	AE	Finalize and process 16th supplemental disclosure		0.20	NO CHARGE
	AE	Prepare letter to Adam regarding: transportation, bedrest, rebuttal expert deadline	300.00	0.20	60.00
07/16/2020	AE	Emails with client [REDACTED]	300.00	0.20	60.00
	AE	Phone call [REDACTED] emails [REDACTED]	300.00	0.20	60.00
	AE	Phone call [REDACTED]	300.00	0.20	60.00
07/17/2020	AE	Email client [REDACTED]	300.00	0.20	60.00
	AE	Phone call [REDACTED] phone call [REDACTED] email [REDACTED] email [REDACTED]	300.00	0.40	120.00
	AE	Prepare letter regarding: rebuttal expert deadline; email to Adam and opposing counsel	300.00	0.30	90.00
	JWF	[REDACTED]		1.00	NO CHARGE
07/19/2020	AE	Prepare ex parte application for extension of rebuttal expert deadline and ex parte order for extension of rebuttal expert deadline	300.00	0.60	180.00
07/20/2020	JWF	Revisions to letter to Adam regarding his questions about bed rest.		0.20	NO CHARGE
	AE	Revisions to letter to Adam regarding: bedrest; emails with client [REDACTED] finalize and process same	300.00	0.30	90.00
	AE	Prepare motion for extension of rebuttal expert deadline; prepare ex parte application for order shortening time and order shortening time regarding: same; finalize and process motion	300.00	1.20	360.00

003698

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 07/27/2020
Statement No. 55605
Page No. 4

			Rate	Hours	
	JWF	Review motion to extend time for rebuttal expert.		0.30	NO CHARGE
	JWF	Review and revise letter to opposing counsel regarding bedrest issue.		0.20	NO CHARGE
07/21/2020	AIR	Correspondence [REDACTED] [REDACTED]		0.20	NO CHARGE
	AIR	Correspondence [REDACTED] [REDACTED] [REDACTED]		0.20	NO CHARGE
	JWF	Review email from Mr. Solinger to court regarding proposed order; email to court [REDACTED]	400.00	0.20	80.00
	AE	Finish ex parte application for order shortening time and order shortening time; finalize and process same; prepare, finalize, and process certificate of service for notice of hearing		0.40	NO CHARGE
	JWF	Review opposing counsel letter to court regarding proposed order; draft email to court regarding same.	400.00	0.20	80.00
07/23/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
	AE	Phone call [REDACTED] [REDACTED]		0.20	NO CHARGE
	JWF	Emails with opposing party regarding bedrest and professionalism.	400.00	0.30	120.00
	JWF	Emails with client [REDACTED] [REDACTED]	400.00	0.30	120.00
07/24/2020	AIR	Revise Motion to Extend Rebuttal Expert Disclosure; submission of same to District Court for filing before the Discovery Commissioner; and service on opposing party.	180.00	0.30	54.00
	AE	Review and respond to email from client [REDACTED] [REDACTED]	300.00	0.20	60.00
		For Current Services Rendered		20.50	6,629.00

Expenses

06/27/2020	Filing Fee.		3.50
[REDACTED]	[REDACTED]		[REDACTED]
07/06/2020	Filing Fee.		3.50
07/20/2020	Filing Fee.		3.50
07/21/2020	Filing Fee.		3.50
07/21/2020	Filing Fee.		3.50
07/24/2020	Filing Fee.		3.50

003699

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 07/27/2020
Statement No. 55605
Page No. 5

Total Expenses	3,562.50
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Total Amount of this Bill	10,191.50
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Payments

07/02/2020	Payment -thank you	-3,465.75
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07/27/2020	Payment	-3,465.75
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Total Payments	-6,931.50
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Balance Due	<u>\$3,260.00</u>
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Trust Account

	Previous Balance in Trust	\$3,465.75
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07/27/2020	Payment	
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	PAYEE: Pecos Law Group	-3,465.75
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	Remaining Balance in Trust	<u>\$0.00</u>
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Please Remit	<u>\$3,260.00</u>
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1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after July 24, 2020 may not be reflected on this statement.

3. Payments Received after July 24, 2020 may not be reflected on this statement.

003700

PECOS LAW GROUP

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: August 27, 2020
Statement No. 56177
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
07/27/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
	JWF	[REDACTED]		0.20	NO CHARGE
	JWF	[REDACTED]		0.30	NO CHARGE
	AE	[REDACTED] prepare for disclosure; begin preparing 17th supplemental disclosure	300.00	0.40	120.00
	AE	Begin preparing motion to continue trial; emails with client [REDACTED]	300.00	1.20	360.00
07/28/2020	JWF	Review and revise motion to continue trial.	400.00	0.20	80.00
	AE	Finish draft of motion to continue trial; email [REDACTED]		0.40	NO CHARGE
	AE	Revisions to draft of motion to continue trial; email to client [REDACTED]	300.00	0.50	150.00
07/29/2020	AE	Revisions to motion; email to client [REDACTED]		0.20	NO CHARGE
	AE	Email to Adam with courtesy copies of the notice of hearing, certificate of service, and motion to continue trial	300.00	0.20	60.00
	AE	Finalize and process motion to continue trial; serve amended notice of hearing; prepare, finalize, and process certificate of service of notice of hearing	300.00	0.30	90.00
07/30/2020	JWF	[REDACTED]		0.20	NO CHARGE
	AE	Prepare ex parte application for order shortening time on motion			

003701

Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 08/27/2020
 Statement No. 56177
 Page No. 2

		Rate	Hours	
	to continue trial and order shortening time	300.00	0.20	60.00
	AE [REDACTED] [REDACTED] email to client [REDACTED] finalize and process 17th supplemental disclosure	300.00	1.80	540.00
	AE Prepare updated trial subpoenas and letter [REDACTED]		0.20	NO CHARGE
07/31/2020	AE Email to client [REDACTED] schedule Zoom meeting	300.00	0.20	60.00
	AIR Correspondence to Adam Solinger enclosing a courtesy copy of the Defendant's Motion to Extend Rebuttal Expert Deadline and for Attorney's Fees.		0.20	NO CHARGE
	AE Email to client [REDACTED]	300.00	0.20	60.00
	AE Prepare, finalize and process certificate of service of notice of hearing; email courtesy copy of certificate and notice of hearing to Adam; revise ex parte application for order shortening time on motion to continue; finalize and process same; submit order shortening time to Dept. I		0.50	NO CHARGE
	AE [REDACTED]		0.40	NO CHARGE
08/02/2020	AE [REDACTED]	300.00	1.40	420.00
08/03/2020	AE Review and respond to email from client [REDACTED] [REDACTED]		0.20	NO CHARGE
	AE Finalize subpoenas [REDACTED] [REDACTED]		0.30	NO CHARGE
08/04/2020	AIR Teleconference [REDACTED] [REDACTED]		0.20	NO CHARGE
	JWF Email [REDACTED] [REDACTED] draft responsive email.	400.00	0.30	120.00
08/05/2020	AIR Preparation of initial draft of Order to Continue Trial.	180.00	0.40	72.00
	AIR Correspondence to Judge's chambers enclosing the proposed Order to Continue Trial for review and execution.		0.20	NO CHARGE
	AIR Teleconference [REDACTED] [REDACTED]		0.20	NO CHARGE
	JWF Review and revise opposition to countermotion for sanctions.	400.00	0.40	160.00

003702

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 08/27/2020
Statement No. 56177
Page No. 3

		Rate	Hours	
	AE [REDACTED]	300.00	0.50	150.00
	AE Prepare reply to non-opposition and opposition to counter motion for sanctions; revisions to same; finalize and process	300.00	1.60	480.00
08/10/2020	AE Review and process order to continue trial; prepare notice of entry of order to continue trial; calendar updated trial dates and deadlines; email Adam courtesy copy of order and notice of entry of order	300.00	0.50	150.00
08/19/2020	JWF Review order granting attorney fees (Schneider)	400.00	0.20	80.00
08/20/2020	AIR Revise June 30, 2020 Order per the Court's Return of Order notice; and correspondence to chambers enclosing the revised Order for review and approval.	180.00	0.30	54.00
08/24/2020	AE Review and respond to email from Adam regarding: financial issues; email to client [REDACTED]	300.00	0.20	60.00
	For Current Services Rendered		11.20	3,386.00

Expenses

07/29/2020	Filing Fee.	3.50
07/31/2020	Filing Fee.	3.50
07/31/2020	Filing Fee.	3.50
08/05/2020	Filing Fee.	3.50
08/10/2020	Filing Fee.	3.50
08/10/2020	Filing Fee.	3.50
08/19/2020	Process Server. John Wilks Process Serving	260.00
	Total Expenses	281.00

Total Amount of this Bill 3,667.00

Previous Balance \$3,260.00

Payments

07/30/2020 Payment -thank you -7,000.00

Courtesy Credit -78.00

Credit Balance -\$151.00

Total Credit Balance -\$151.00

003703

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Chalese Solinger
curlyfriez09@gmail.com

Statement Date: September 25, 2020

Statement No. 56477

Account No. 1896.00

Page: 1

RE: Divorce

Fees

			Rate	Hours	
08/31/2020	AR	Telephone conference from discovery office that hearing is off.		0.20	NO CHARGE
09/01/2020	AE	Prepare 18th supplemental disclosure	300.00	0.30	90.00
09/03/2020	AB	Email [REDACTED]	180.00	0.20	36.00
09/04/2020	AB	Email to Adam regarding potential settlement conference.		0.20	NO CHARGE
09/08/2020	AE	Phone call [REDACTED]		0.20	NO CHARGE
09/09/2020	AE	Sign release for Dr. Paglini's report and email same back to Dept. I		0.20	NO CHARGE
	JWF	Detailed review of custody evaluation.	400.00	1.50	600.00
	AE	Review Dr. Paglini's custody evaluation		1.60	NO CHARGE
09/10/2020	AE	Phone call and email to client [REDACTED]		0.20	NO CHARGE
	AE	Set up Zoom meeting [REDACTED]		0.20	NO CHARGE
	AB	Prepare notice of entry of order from June 30, 2020 hearing.	180.00	0.20	36.00
09/11/2020	JWF	Zoom meeting with client [REDACTED]	400.00	0.50	200.00
	AE	Zoom meeting with client [REDACTED]		0.50	NO CHARGE
09/12/2020	BS	Exchange emails [REDACTED]		0.20	NO CHARGE
09/13/2020	BS	Exchange emails [REDACTED]		0.20	NO CHARGE
09/14/2020	BS	Exchange emails [REDACTED]		0.20	NO CHARGE

003704

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 09/25/2020
Statement No. 56477
Page No. 2

			Rate	Hours	
	BS	Exchange emails [REDACTED]			
		[REDACTED]	575.00	0.20	115.00
	AE	Phone call [REDACTED]	300.00	0.20	60.00
09/15/2020	BS	Telephone conference [REDACTED]	575.00	0.70	402.50
09/16/2020	AE	Prepare third set of interrogatories and second set of requests for production	300.00	0.70	210.00
	AE	[REDACTED]	300.00	2.70	810.00
	AE	Email to Dept. I regarding: judicial settlement conference		0.20	NO CHARGE
09/17/2020	BS	Research [REDACTED]		0.20	NO CHARGE
	AE	Phone call [REDACTED]	300.00	0.20	60.00
09/18/2020	BS	Email [REDACTED]		0.20	NO CHARGE
	AE	[REDACTED]	300.00	0.20	60.00
09/20/2020	BS	Receive and review [REDACTED]		0.20	NO CHARGE
09/21/2020	AE	[REDACTED]	300.00	0.70	210.00
	BS	Receive and review email [REDACTED]	575.00	0.20	115.00
		For Current Services Rendered		8.50	3,004.50
		Total Amount of this Bill			3,004.50
		Previous Balance			-\$151.00
		Balance Due			\$2,853.50
		Please Remit			\$2,853.50

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after September 24, 2020 may not be reflected on this statement.

3. Payments Received after September 24, 2020 may not be reflected on this statement.

003705

PECOS LAW GROUP

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Chalese Solinger
curlyfriez09@gmail.com

Statement Date: October 27, 2020
Statement No. 56984
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
09/29/2020	AE	Review and respond to email from Adam regarding: settlement conference	300.00	0.20	60.00
	BS	Email [REDACTED]		0.20	NO CHARGE
	AE	Phone calls and emails [REDACTED]	300.00	0.40	120.00
09/30/2020	BS	Exchange emails [REDACTED]	575.00	0.20	115.00
	AE	Emails [REDACTED]	300.00	0.20	60.00
10/01/2020	AE	Phone call [REDACTED]	300.00	0.20	60.00
	BS	Exchange emails [REDACTED]		0.20	NO CHARGE
10/05/2020	AE	Email [REDACTED]	300.00	0.20	60.00
10/06/2020	JWF	Emails with opposing party regarding settlement and his opposition to allowing release of custody evaluation to potential experts.	400.00	0.30	120.00
	JWF	Emails with opposing party regarding settlement issues.	400.00	0.30	120.00
	AE	Prepare ex parte application and order to release Dr. Paglini's report to experts	300.00	0.50	150.00
	AE	Phone all [REDACTED]	300.00	0.30	90.00
10/07/2020	JWF	Draft motion to clarify release.	400.00	2.20	880.00
	JWF	Review notice of hearing (have not been served with a motion, nothing accessible on Odyssey)	400.00	0.20	80.00
	JWF	Review opposing party motion (not served) regarding clarification of June 30, 2020 Order	400.00	0.30	120.00

003706

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/27/2020
Statement No. 56984
Page No. 2

			Rate	Hours	
	AE	Phone call to client [REDACTED]	300.00	0.20	60.00
	AB	Prepare exhibits to motion; prepare 19th supplemental disclosures.	180.00	1.00	180.00
10/12/2020	JWF	Review and review Ex Parte Application for Order shortening time and Order shortening time	400.00	0.30	120.00
	AIR	Finalize Ex Parte Application for Order Shortening Time; submission of same to District Court for filing; service on opposing party; and correspondence to judge's chambers enclosing the proposed Order shortening time for review and signature.	180.00	0.40	72.00
	AE	Begin preparing ex parte application for order shortening time and order shortening time on motion to clarify order	300.00	0.20	60.00
10/16/2020	JWF	Begin drafting opposition to motion to clarify reasoning behind June 30 order	400.00	1.30	520.00
10/18/2020	JWF	Finalize draft of opposition to motion to clarify (review file for correspondence regarding frivolous positions)	400.00	0.80	320.00
10/21/2020	AIR	Preparation of Notice of Entry of Order Shortening Time; submission of same to District Court for filing; and service on opposing party via e-service and email.	180.00	0.30	54.00
		For Current Services Rendered		10.00	3,421.00

Expenses

[REDACTED]	[REDACTED]	[REDACTED]
10/07/2020	Filing Fee.	3.50
10/08/2020	Filing Fee.	3.50
10/08/2020	Filing Fee.	3.50
10/12/2020	Filing Fee.	3.50
10/20/2020	Filing Fee.	3.50
10/21/2020	Filing Fee.	3.50
	Total Expenses	296.00
	Total Amount of this Bill	3,717.00
	Previous Balance	\$2,853.50

Payments

10/27/2020	Payment	-5,000.00
	Balance Due	<u>\$1,570.50</u>

003707

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 10/27/2020
Statement No. 56984
Page No. 3

Trust Account

	Previous Balance in Trust	\$0.00
09/28/2020	Payment	5,000.00
10/27/2020	Payment	
	PAYEE: Pecos Law Group	-5,000.00
	Remaining Balance in Trust	\$0.00

Please Remit

\$1,570.50

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after October 25, 2020 may not be reflected on this statement.

3. Payments Received after October 25, 2020 may not be reflected on this statement.

003708

PECOS LAW GROUP

BRUCE I. SHAPIRO

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: November 23, 2020
Statement No. 57036
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
10/26/2020	AE	Prepare for 10/27/2020 hearing	300.00	0.30	90.00
10/27/2020	AE	Phone call [REDACTED]		0.20	NO CHARGE
11/02/2020	AE	Begin preparing Confidentiality Agreement	300.00	1.20	360.00
11/04/2020	AE	Revisions to proposed Confidentiality Agreement; email same to Adam	300.00	0.20	60.00
11/05/2020	AE	Begin preparing brief regarding: proposed Confidentiality Agreement		0.20	NO CHARGE
11/06/2020	AE	Revise brief regarding: proposed Confidentiality Agreement; finalize same	300.00	0.20	60.00
11/12/2020	BS	Exchange emails with Adam regarding status and telephone conference.		0.20	NO CHARGE
	AE	Finish preparing third set of interrogatories and second set of requests for production; finalize same	300.00	0.20	60.00
11/13/2020	BS	Telephone conference [REDACTED]	575.00	0.30	172.50
	AE	Prepare stipulation and order regarding: confidentiality agreement and stipulated confidentiality agreement; emails with Adam regarding: same; email to Dept. I with signed stipulation and order	300.00	0.50	150.00
11/16/2020	AB	Prepare notice of entry of stipulation and order regarding confidentiality agreement.	180.00	0.20	36.00
11/18/2020	AE	Phone calls [REDACTED]	300.00	0.30	90.00

003709

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 11/23/2020
Statement No. 57036
Page No. 2

	Rate	Hours	
For Current Services Rendered		3.40	1,078.50

Expenses

11/06/2020	Filing Fee.	3.50
11/16/2020	Filing Fee.	3.50
	Total Expenses	<u>7.00</u>

Total Amount of this Bill	1,085.50
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Previous Balance	\$1,570.50
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Payments

11/01/2020	Payment -thank you	-1,570.50
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Balance Due	<u>\$1,085.50</u>
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Please Remit	<u><u>\$1,085.50</u></u>
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1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after January 26, 2021 may not be reflected on this statement.

3. Payments Received after January 26, 2021 may not be reflected on this statement.

003710

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: December 29, 2020
Statement No. 57317
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
11/24/2020	AE	Email [REDACTED]	300.00	0.20	60.00
12/04/2020	JWF	Emails with client [REDACTED].	400.00	0.30	120.00
	JWF	Emails with client [REDACTED].		0.20	NO CHARGE
	JWF	Additional emails with client [REDACTED]	400.00	0.20	80.00
	JWF	Additional emails with client [REDACTED]	400.00	0.20	80.00
12/08/2020	AE	Phone calls with client [REDACTED] email test results to Adam and inquire about spousal support	300.00	0.20	60.00
12/15/2020	AE	Review discovery responses sent by Adam; review Adam's motion to terminate spousal support; begin preparing opposition to same	300.00	1.60	480.00
	AE	Emails with client [REDACTED]	300.00	0.20	60.00
12/16/2020	AE	Emails [REDACTED] email to client [REDACTED]	300.00	0.20	60.00
12/17/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00
12/20/2020	AE	Prepare letter [REDACTED]		0.20	NO CHARGE
12/21/2020	AE	Email to client [REDACTED] [REDACTED] email [REDACTED]	300.00	0.20	60.00
12/22/2020	AE	Email to client [REDACTED]	300.00	0.20	60.00

003711

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 12/29/2020
Statement No. 57317
Page No. 2

	Rate	Hours	
For Current Services Rendered		3.70	1,180.00

Expenses

12/23/2020	Expert. William O'Donohue	4,750.00
	Total Expenses	4,750.00
	Total Amount of this Bill	5,930.00
	Previous Balance	\$1,085.50

Payments

12/05/2020	Payment -thank you	-1,085.50
	Balance Due	<u>\$5,930.00</u>
	Please Remit	<u>\$5,930.00</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after January 26, 2021 may not be reflected on this statement.

3. Payments Received after January 26, 2021 may not be reflected on this statement.

003712

PECOS LAW GROUP

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Chalese Solinger
curlyfriez09@gmail.com

Statement Date: January 27, 2021
Statement No. 57598
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
12/29/2020	AE	Phone call [REDACTED]	300.00	0.20	60.00
01/05/2021	JWF	Emails with opposing party regarding new judge and opposing party desire to file motion for recusal.	400.00	0.20	80.00
	AE	Review reply filed by Adam; email to client [REDACTED]	300.00	0.20	60.00
01/11/2021	AIR	Correspondence [REDACTED]	180.00	0.20	36.00
01/13/2021	AE	Email to client [REDACTED]	300.00	0.20	60.00
01/15/2021	AIR	Correspondence to client [REDACTED]	180.00	0.20	36.00
	AIR	Continuing correspondence [REDACTED]	180.00	0.20	36.00
	AE	Review and respond to email [REDACTED]	300.00	0.20	60.00
01/19/2021	AE	Review email from Adam regarding: booster seats and helmets; email to client [REDACTED]	300.00	0.20	60.00
	AE	Review [REDACTED] begin preparing responsive letter to Adam	300.00	0.30	90.00
01/20/2021	AIR	Correspondence [REDACTED]	180.00	0.20	36.00
	AE	Finish preparing letter to Adam regarding: carseats and helmets; email to client [REDACTED]	300.00	0.20	60.00
01/21/2021	AIR	Correspondence [REDACTED]			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/27/2021
Statement No. 57598
Page No. 2

		Rate	Hours	
	[REDACTED]	180.00	0.20	36.00
AIR	Correspondence to opposing party via email.	180.00	0.20	36.00
JWF	[REDACTED] telephone call [REDACTED] [REDACTED]	400.00	0.30	120.00
AE	Phone call [REDACTED]		0.20	NO CHARGE
AE	Prepare expert witness disclosure and begin preparing 21st supplemental disclosure	300.00	0.30	90.00
01/25/2021	AE Review and respond to emails from client [REDACTED] [REDACTED] emails [REDACTED] [REDACTED]	300.00	0.30	90.00
01/26/2021	BS Exchange emails [REDACTED]	575.00	0.20	115.00
AIR	Correspondence [REDACTED] [REDACTED]	180.00	0.20	36.00
AE	Review Adam's second request for production of documents; emails [REDACTED] [REDACTED]	300.00	0.20	60.00
	For Current Services Rendered		4.40	1,257.00

Expenses

12/28/2020	Filing Fee.	3.50
	Total Expenses	3.50
	Total Amount of this Bill	1,260.50
	Previous Balance	\$5,930.00

Payments

01/11/2021	Payment -thank you.	-5,930.00
	Balance Due	<u>\$1,260.50</u>
	Please Remit	<u>\$1,260.50</u>

003714

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 01/27/2021
Statement No. 57598
Page No. 3

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after January 26, 2021 may not be reflected on this statement.

3. Payments Received after January 26, 2021 may not be reflected on this statement.

003715

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: February 25, 2021
Statement No. 57893
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
01/27/2021	AIR	Correspondence to opposing party via email.	180.00	0.20	36.00
	JWF	Telephone call [REDACTED]	400.00	0.50	200.00
	JWF	Prepare for phone call with client; [REDACTED]	400.00	0.50	200.00
	AIR	Correspondence to opposing party requesting a Word version of his 2nd set of requests for production of documents.	180.00	0.20	36.00
	AE	Phone call [REDACTED]		0.60	NO CHARGE
	AE	Prepare letter to Adam regarding: Jessica picking up the children	300.00	0.20	60.00
01/29/2021	JWF	Review opposing party emails refusing to provide word doc for discovery responses; photograph of letter from physical therapist regarding leg injury.	400.00	0.20	80.00
	AE	Prepare updated subpoenas to Bank of America and ADP; prepare notice of same; finalize same	300.00	0.40	120.00
02/01/2021	JWF	Email from opposing party regarding exchange issue; emails with client [REDACTED] email client [REDACTED]	400.00	0.40	160.00
	AIR	Correspondence [REDACTED]	180.00	0.20	36.00
	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
	BS	Telephone conference [REDACTED]	575.00	0.30	172.50
	JWF	Emails with client and opposing party [REDACTED]			

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 02/25/2021
 Statement No. 57893
 Page No. 2

			Rate	Hours	
			400.00	0.20	80.00
	AE	Review emails from Adam regarding: transporting the children; emails with client [REDACTED] phone call to client [REDACTED]	300.00	0.40	120.00
	JWF	Emails with opposing party and client [REDACTED]	400.00	0.30	120.00
02/02/2021	AE	Prepare deposition subpoena and notice of deposition of Dr. Paglini	300.00	0.20	60.00
02/03/2021	AE	Email to Adam regarding: providing Paglini report to client	300.00	0.20	60.00
	JWF	Emails with client [REDACTED]	400.00	0.30	120.00
	JWF	Emails and communications with client [REDACTED]	400.00	0.30	120.00
02/04/2021	JWF	Review client email [REDACTED]	400.00	0.20	80.00
02/05/2021	AIR	Finalize Defendant's 21st set of NRCP 16.2 Disclosures and Witness List, Defendant's First Disclosure of Expert Witness, and Notice of Taking Deposition of Dr. Paglini; and service of same on opposing party.	180.00	0.50	90.00
02/07/2021	AE	Email [REDACTED]	300.00	0.20	60.00
	AIR	Preparation of initial draft of Defendant's Responses to Plaintiff's 2nd set of Requests for Production of Documents.	180.00	1.00	180.00
	AIR	Correspondence to process server, enclosing the Deposition Subpoena for service on Dr. Paglini.	180.00	0.20	36.00
02/08/2021	AE	Email to client [REDACTED]	300.00	0.20	60.00
	AE	Continue preparing Defendant's Responses to Plaintiff's 2nd set of Requests for Production	300.00	2.00	600.00
02/09/2021	AE	Phone call [REDACTED]	300.00	0.20	60.00
	AE	Review email from client; continue preparing Defendant's Responses to Plaintiff's 2nd set of Requests for Production	300.00	0.90	270.00
02/10/2021	AE	Begin preparing 22nd disclosure; review letter from Dr. Paglini and send to Adam	300.00	0.40	120.00
02/12/2021	AE	Phone call with client [REDACTED] email to Adam regarding: extension	300.00	0.30	90.00

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 02/25/2021
 Statement No. 57893
 Page No. 3

			Rate	Hours	
02/15/2021	AE	Redact updated billing statements for disclosure	300.00	1.00	300.00
02/16/2021	JWF	Email to client [REDACTED]	400.00	0.30	120.00
	AE	Phone call with client [REDACTED] email to client [REDACTED]	300.00	0.20	60.00
	JWF	Revise client responses to requests for production of documents (objections)	400.00	0.80	320.00
	JWF	Emails with opposing party about continued complaint regarding children wearing helmets.	400.00	0.20	80.00
	AE	Review documents and emails from client; add documents to 22nd disclosure; continue preparing responses to second request for production of documents; emails with client [REDACTED]	300.00	1.80	540.00
	AIR	Finalize Defendant's 22nd set of 16.2 Disclosures and Responses to 2nd set of requests for production of documents; and service of same on opposing party.	180.00	1.00	180.00
02/17/2021	AE	Email to Adam regarding: new date for Dr. Paglini deposition	300.00	0.20	60.00
	AE	Prepare for 2/18/2021 hearing	300.00	0.40	120.00
02/18/2021	JWF	Prepare for hearing.	400.00	0.70	280.00
	JWF	Attend hearing.	400.00	0.60	240.00
	JWF	Discussion with client [REDACTED]	400.00	0.30	120.00
	AE	Attend hearing with J. Fleeman		0.60	NO CHARGE
	AE	Meet with client [REDACTED]		0.20	NO CHARGE
02/19/2021	AIR	Correspondence to transcript video services requesting the video from the February 18, 2021 hearing.	180.00	0.20	36.00
	AE	Prepare notice to vacate deposition of Dr. Paglini; email to client [REDACTED]	300.00	0.20	60.00
	JWF	Emails with opposing party regarding trial presentation and request for copy of signed agreement; review 3rd request for production of documents and draft response to the same.	400.00	0.70	280.00
02/22/2021	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
	JWF	Emails with client and opposing party [REDACTED]	400.00	0.30	120.00
	AE	Email [REDACTED]	300.00	0.20	60.00

003718

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 02/25/2021
Statement No. 57893
Page No. 4

			Rate	Hours	
02/23/2021	AE	Review hearing video and prepare order on 2/18/21 hearing	300.00	0.50	150.00
	JWF	Review proposed order prior to submission to opposing counsel.	400.00	0.20	80.00
02/24/2021	AE	Email to Adam with proposed order; email to client [REDACTED]	300.00	0.20	60.00
		For Current Services Rendered		21.50	6,852.50

Expenses

02/17/2021		Process Server. John Wilks Process Serving			50.00
		Total Expenses			50.00
		Total Amount of this Bill			6,902.50
		Previous Balance			\$1,260.50

Payments

02/01/2021		Payment -thank you			-1,260.50
		Balance Due			<u>\$6,902.50</u>
		Please Remit			<u>\$6,902.50</u>

1. Please note your payment is due within 15 days from the date of this statement.

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3. Payments Received after February 24, 2021 may not be reflected on this statement.

003719

PECOS LAW GROUP

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: March 26, 2021
Statement No. 58185
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
02/25/2021	AE	Receive and review emails [REDACTED]	300.00	0.20	60.00
03/01/2021	AE	Email to client [REDACTED]	300.00	0.20	60.00
03/02/2021	AIR	Correspondence to Adam Solinger enclosing the link for the 02/18/21 hearing video.	180.00	0.20	36.00
03/03/2021	AE	Prepare [REDACTED]	300.00	0.90	270.00
03/04/2021	AE	Emails with client [REDACTED]	300.00	0.20	60.00
	JWF	Prepare for telephone call [REDACTED] telephone call.	400.00	0.30	120.00
	JWF	Email to opposing party regarding trial witness presentation.	400.00	0.20	80.00
	JWF	Review [REDACTED]	400.00	0.30	120.00
	AE	Review [REDACTED]		0.30	NO CHARGE
	AE	Phone call [REDACTED]		0.20	NO CHARGE
03/08/2021	AE	Begin preparing 23rd supplemental disclosure	300.00	0.70	210.00
03/09/2021	AE	Emails with client [REDACTED]	300.00	0.20	60.00
	JWF	Review [REDACTED]	400.00	0.30	120.00
	AE	Finish preparing 23rd supplemental disclosure	300.00	0.40	120.00
	AE	Revisions [REDACTED] submit order on 2/18/2021 hearing to Dept. P; prepare notice of entry of 2/18/2021 order; finalize notice of entry	300.00	0.40	120.00

003720

Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 03/26/2021
 Statement No. 58185
 Page No. 2

			Rate	Hours	
03/10/2021	AE	Prepare rebuttal expert report disclosure; finalize same and 23rd supplemental disclosure	300.00	0.30	90.00
03/11/2021	AIR	Correspondence to opposing party enclosing a new link for the February 18, 2021 hearing video.	180.00	0.20	36.00
03/16/2021	AE	Phone call with client [REDACTED]	300.00	0.20	60.00
03/18/2021	AE	Emails with client and opposing party [REDACTED]	300.00	0.20	60.00
03/19/2021	AE	Review motion regarding: school issue filed by Adam; email to client [REDACTED]	300.00	0.20	60.00
03/22/2021	AIR	Submission of Defendant's Responses to Third set of Requests for Production of Documents to District Court for e-service on opposing party.		0.20	NO CHARGE
	JWF	Emails with opposing party regarding discovery issues; email to client [REDACTED]	400.00	0.40	160.00
03/23/2021	JWF	Review Order shortening time and client emails [REDACTED]	400.00	0.30	120.00
03/24/2021	AE	Prepare letter to Adam regarding: motion regarding school; emails with client [REDACTED] finalize letter	300.00	0.30	90.00
03/25/2021	AB	Begin preparation of 24th supplemental disclosures.	180.00	0.40	72.00
	AE	Emails with client [REDACTED] prepare opposition to motion regarding schooling	300.00	1.00	300.00
	AE	Phone call [REDACTED]	300.00	0.20	60.00
		For Current Services Rendered		8.20	2,544.00

Expenses

03/09/2021	Filing Fee.	3.50
	Total Expenses	3.50
	Total Amount of this Bill	2,547.50
	Previous Balance	\$6,902.50

Payments

03/06/2021	Payment -thank you	-6,902.50
	Balance Due	<u>\$2,547.50</u>
	Please Remit	<u>\$2,547.50</u>

003721

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 03/26/2021
Statement No. 58185
Page No. 3

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003722

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date:
Statement No.
Account No.

April 27, 2021
58567
1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
03/26/2021	AE	Revisions to opposition to motion regarding: Michael's schooling; email to client [REDACTED] prepare exhibits to same; review letter from Adam	300.00	0.60	180.00
	AB	Complete 24th supplemental disclosures including redaction of account numbers.	180.00	1.10	198.00
03/28/2021	AE	Finalize opposition to motion regarding: schooling and exhibits	300.00	0.20	60.00
03/29/2021	AE	Phone call to Dept P regarding: trial date; receive and review documents from Bank of America and add same to disclosure		0.40	NO CHARGE
03/30/2021	JWF	Attend hearing; emails [REDACTED]	400.00	0.50	200.00
	AE	Phone call with client [REDACTED] prepare for hearing	300.00	0.40	120.00
	AE	Argue hearing on Adam's motion regarding: schooling		0.30	NO CHARGE
	AE	[REDACTED]	300.00	0.20	60.00
03/31/2021	AE	Emails with client [REDACTED]	300.00	0.30	90.00
04/02/2021	JWF	Draft email to opposing party detailing position on all discovery requests apparently at issue.	400.00	1.20	480.00
04/06/2021	JWF	Emails with opposing party regarding meet and confer and discovery issues.	400.00	1.20	480.00
	JWF	Phone call with client [REDACTED]	400.00	0.20	80.00
04/07/2021	AIR	Preparation of Defendant's 26th set of NRCP 16.2 Disclosures; and service of same on opposing party.	180.00	0.60	108.00

003723

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 04/27/2021
Statement No. 58567
Page No. 2

			Rate	Hours	
	JWF	Email to opposing party regarding discovery issue; review and approve 26th disclosure.	400.00	0.30	120.00
	AE	Begin conducting research [REDACTED]	300.00	0.80	240.00
04/08/2021	JWF	Review Paglini Report and Emails for what opposing counsel wants; draft responsive email regarding discovery issues.	400.00	1.60	640.00
	AIR	Preparation of service of process requests for the Trial Subpoenas [REDACTED] and correspondence to process sever enclosing the same for service.		0.40	NO CHARGE
	AE	Begin preparing fourth responses to requests for production; prepare emails with prior potential rebuttal experts for disclosure; prepare letter to Adam regarding: witnesses appearing virtually	300.00	1.10	330.00
04/09/2021	AE	Prepare order on 3/30/21 hearing; continue preparing pre-trial memorandum; email to client [REDACTED]	300.00	0.80	240.00
04/11/2021	AIR	Preparation of Defendant's 27th set of NRCP 16.2 Disclosures and Witness List, including compiling, redacting and Bates numbering of documents.		1.00	NO CHARGE
04/12/2021	JWF	Review final disclosures and responses to 4th requests for production.	400.00	0.30	120.00
	AIR	Correspondence to client [REDACTED]		0.20	NO CHARGE
	AIR	Revise and finalize Defendant's 27th set of NRCP 16.2 Disclosures, as well as Defendant's Responses to 4th set of Requests for Production of Documents; and service of both on opposing counsel.		1.00	NO CHARGE
	AE	Revisions to responses to 4th requests for production; phone call to client [REDACTED]	300.00	0.20	60.00
	AE	Begin preparing Adam trial exam outline; begin review of Adam's 17th disclosure	300.00	1.70	510.00
04/13/2021	AE	Download and review videos sent by Adam as part of his 17th disclosure; email proposed 3/30/21 order to Adam; prepare authenticity objection to Adam's 17th disclosure	300.00	1.70	510.00
	JWF	Begin drafting trial brief; review of potential exhibits.	400.00	2.10	840.00
04/14/2021	AE	Continue preparing Adam trial exam outline, brief, etc.	300.00	3.00	900.00
04/15/2021	AE	Continue preparing pre-trial memorandum and trial brief; review			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 04/27/2021
Statement No. 58567
Page No. 3

			Rate	Hours	
		letter from Adam; prepare response to same	300.00	1.30	390.00
04/16/2021	JWF	Emails [REDACTED] email from opposing party regarding refusal to allow remote appearance and transportation complaint.	400.00	0.50	200.00
	AE	Email [REDACTED] email to Adam regarding: same; begin research for motion for virtual appearance; review Adam's email regarding: transportation issue; email to client [REDACTED]	300.00	0.50	150.00
04/19/2021	AE	Email to client [REDACTED]	300.00	0.20	60.00
	JWF	Continue drafting trial brief; review of opposing party filings and potential exhibits.	400.00	3.20	1,280.00
04/20/2021	JWF	Meeting [REDACTED]	400.00	1.00	400.00
	AE	Prepare motion to allow witness to appear virtually	300.00	1.30	390.00
04/21/2021	JWF	Review emails [REDACTED] opposing party on transportation issue; review emergency motion.	400.00	0.50	200.00
	AE	Revisions to motion to allow witness to appear virtually; prepare letter to Adam regarding: releasing Dr. O'Donohue's report to Dr. Paglini; emails with client [REDACTED]	300.00	0.50	150.00
04/22/2021	JWF	Emails with opposing party regarding characterization of Dr. Paglini as a witness.	400.00	0.20	80.00
	AE	Email to client [REDACTED] [REDACTED] finalize motion and exhibits	300.00	0.30	90.00
	JWF	Review motions filed by opposing counsel; research [REDACTED]	400.00	0.80	320.00
04/23/2021	JWF	Emails [REDACTED]	400.00	0.20	80.00
	AE	Review motion in limine and motion for sanctions filed by Adam; prepare opposition to motion in limine; prepare letter to Adam regarding: motion for sanctions	300.00	1.80	540.00
	AE	Prepare ex parte application for order shortening time on motion to allow witness to appear virtually and order shortening time	300.00	0.20	60.00
	AE	Emails with client and Adam [REDACTED] review and respond to email from Adam regarding: pretrial conference	300.00	0.30	90.00
04/26/2021	AIR	Correspondence to Jessica Sellers enclosing the check for her appearance fee at Trial.	180.00	0.20	36.00

003725

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 04/27/2021
Statement No. 58567
Page No. 4

	Rate	Hours	
AE Phone call [REDACTED] finalize letter to Adam regarding: motion for sanctions	300.00	0.20	60.00
AE Begin compiling trial exhibits	300.00	1.80	540.00
For Current Services Rendered		35.10	11,682.00

Expenses

03/28/2021	Filing Fee.	3.50
03/29/2021	Miscellaneous. Bank of America	20.00
04/22/2021	Filing Fee.	3.50
04/26/2021	Witness Fee. Jessica Sellers	39.00
	Total Expenses	66.00

Total Amount of this Bill 11,748.00

Previous Balance \$2,547.50

Payments

03/31/2021	Payment -thank you	-2,547.50
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Balance Due \$11,748.00

Please Remit \$11,748.00

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after April 26, 2021 may not be reflected on this statement.

3. Payments Received after April 26, 2021 may not be reflected on this statement.

003726

PECOS LAW GROUP

BRUCE I. SHAPIRO

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date:
Statement No.
Account No.

May 26, 2021
58870
1896.00
Page: 1

RE: Divorce

\$10,000 courtesy credit from Bruce I. Shapiro

Fees

			Rate	Hours	
04/27/2021	AE	Prepare trial exhibits	300.00	5.90	1,770.00
	AE	Finalize opposition to motion in limine	300.00	0.20	60.00
04/28/2021	JWF	Pre-Trial Conference; [REDACTED]	400.00	1.00	400.00
	AIR	Correspondence to client [REDACTED]	180.00	0.20	36.00
	AIR	Compile Affidavit of Service with Trial Subpoena for Jessica Sellers; submission of same to District Court for filing; and service on opposing counsel.	180.00	0.20	36.00
	AE	Attend pre-trial conference with J. Fleeman and Adam via Zoom; [REDACTED]		1.00	NO CHARGE
	AE	Continue preparing trial exhibits; email to client [REDACTED] [REDACTED] email to Adam with list of exhibits	300.00	0.50	150.00
04/29/2021	AE	Finish preparing draft of pre-trial memorandum	300.00	0.70	210.00
	AE	Review Adam's opposition to motion to have witness appear virtually; prepare for 4/30/21 hearing	300.00	0.50	150.00
	JWF	Begin review and revisions of Pre-Trial Memorandum	400.00	0.50	200.00
04/30/2021	AIR	Correspondence [REDACTED]	180.00	0.20	36.00
	AIR	Correspondence to Judge's department enclosing the March 30th Order for review and signature.	180.00	0.20	36.00

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 05/26/2021
 Statement No. 58870
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			Rate	Hours	
	AE	Attend motion hearing with J. Fleeman via BlueJeans	300.00	0.30	90.00
	AE	Revisions to pre-trial memorandum; continue preparing trial brief; continue preparing for trial	300.00	3.70	1,110.00
	AIR	Compile Trial Exhibits in electronic format.	180.00	3.00	540.00
	JWF	Prepare for Solinger Hearing; attend hearing.	400.00	0.50	200.00
05/02/2021	JWF	Review and revise Pretrial memorandum (draft 4).	400.00	0.80	320.00
05/03/2021	AIR	Correspondence to Evidence submission division, requesting link to upload all Trial Exhibits.	180.00	0.20	36.00
	AIR	Preparation of Defendant's Trial Exhibit Binders for the Judge and Clerk.	180.00	6.00	1,080.00
	AIR	Correspondence to opposing party enclosing copies of Defendant's Trial Exhibits via Sharepoint link.	180.00	0.20	36.00
	AIR	Correspondence to Jessica Sellers enclosing another check for \$6.16 for her appearance at Trial via subpoena.	180.00	0.20	36.00
	AE	Review and revise pre-trial memorandum and finalize same; prepare updated financial disclosure form and finalize same	300.00	1.10	330.00
	AE	Phone calls and emails with client [REDACTED]	300.00	0.20	60.00
	AE	Begin preparing [REDACTED]	300.00	1.20	360.00
	AE	Preparation of trial exhibits		1.10	NO CHARGE
	AE	Continue preparing trial brief	300.00	1.80	540.00
	AB	Deliver trial exhibits to court.	180.00	1.00	180.00
05/04/2021	AIR	Correspondence to Judge's chambers enclosing the proposed March 31st Order with both counsel's signatures.	180.00	0.20	36.00
	AIR	Preparation of Notice of Entry of Order; submission of same to District Court for filing; and service of same on opposing counsel.	180.00	0.20	36.00
	AE	Email to Adam and Dept P regarding: 2/18/21 hearing order	300.00	0.20	60.00
	AE	Finish first draft of trial brief	300.00	2.70	810.00
	AE	Continue preparing [REDACTED]	300.00	0.90	270.00
05/05/2021	AIR	Preparation of Trial Binders for Plaintiff, Defendant and Witness copies.	180.00	3.00	540.00

Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 05/26/2021
Statement No. 58870
Page No. 3

			Rate	Hours	
	AE	Phone call [REDACTED] [REDACTED]	300.00	0.30	90.00
	AE	Finish preparing [REDACTED] prepare [REDACTED] [REDACTED]	300.00	3.60	1,080.00
	AE	Prepare objection to Adam's 18th disclosure and finalize same; phone call [REDACTED]	300.00	0.30	90.00
	JWF	Review case file [REDACTED] [REDACTED]	400.00	2.30	920.00
05/06/2021	AE	Review and respond to email from Adam regarding: trial logistics	300.00	0.20	60.00
	JWF	Finish prep for meeting with client [REDACTED]	400.00	1.00	400.00
	JWF	First meeting with client [REDACTED]	400.00	4.00	1,600.00
	JWF	Telephone call [REDACTED]	400.00	0.20	80.00
	AIR	Correspondence [REDACTED] [REDACTED]	180.00	0.20	36.00
	AIR	Correspondence to client [REDACTED] [REDACTED]	180.00	0.20	36.00
	AIR	Review of all Objections of authenticity and/or genuineness prepared throughout the case.	180.00	0.60	108.00
	AIR	Teleconference and correspondence [REDACTED] [REDACTED]	180.00	0.20	36.00
	AE	Prepare for [REDACTED] meeting with client	300.00	0.60	180.00
	AE	Meet with client [REDACTED] [REDACTED]		4.00	NO CHARGE
	AE	Continue preparing for trial [REDACTED] [REDACTED]	300.00	4.80	1,440.00
05/07/2021	JWF	Review and revise [REDACTED] [REDACTED]	400.00	1.20	480.00
	JWF	Zoom meeting with client [REDACTED]	400.00	2.00	800.00
	JWF	Review and revise trial brief.	400.00	1.50	600.00
	JWF	Trial Prep [REDACTED] [REDACTED]	400.00	2.30	920.00
	AE	Zoom meeting with client [REDACTED] [REDACTED]		2.00	NO CHARGE
	AE	Continue trial preparation [REDACTED] revisions to trial brief; finalize same; prepare orders and reports for trial [REDACTED]			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 05/26/2021
Statement No. 58870
Page No. 4

			Rate	Hours	
			300.00	5.80	1,740.00
	AE	Prepare [REDACTED]	300.00	2.50	750.00
05/08/2021	JWF	Continue trial prep.	400.00	2.30	920.00
05/09/2021	JWF	Final preparation day for trial.	400.00	10.30	4,120.00
	AE	Final preparation for trial	300.00	1.00	300.00
05/10/2021	AE	Attend first day of trial with J. Fleeman and client		8.00	NO CHARGE
	JWF	Trial - Day 1	400.00	8.00	3,200.00
05/13/2021	JWF	Emails with V. Mayo; telephone with V. Mayo regarding potential motion to disqualify.	400.00	0.30	120.00
	JWF	Review motion to disqualify judge.	400.00	0.30	120.00
	JWF	Begin research [REDACTED]	400.00	0.80	320.00
05/14/2021	AIR	Correspondence to Family Court's video transcript services requesting the hearing video from the Trial on May 10th.	180.00	0.20	36.00
	AIR	Receive and download all four parts of the hearing video from the May 10th Trial.	180.00	0.20	36.00
	JWF	Research law [REDACTED] review file and draft opposition to motion to disqualify.	400.00	7.20	2,880.00
	AE	Review and revise opposition to motion to disqualification	300.00	0.90	270.00
	JWF	Review [REDACTED] make additional revisions and finalize for filing.	400.00	0.30	120.00
	AIR	Finalize Opposition to Motion to Disqualify; preparation of District Court Opposition Fee Information Sheet; submission of Opposition to District Court for filing; and service on opposing party and counsel.	180.00	0.30	54.00
	AIR	Correspondence to Vince Mayo enclosing a courtesy copy of the Opposition and Countermotion to Motion to Disqualify Judge.	180.00	0.20	36.00
05/19/2021	AIR	Teleconference and correspondence [REDACTED]	180.00	0.20	36.00
	JWF	Email [REDACTED]	400.00	0.20	80.00
05/24/2021	AE	Review response from Judge Perry to Adam's motion to disqualify	300.00	0.20	60.00
		For Current Services Rendered		104.20	33,908.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 05/26/2021
Statement No. 58870
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Expenses

04/27/2021	Filing Fee.	3.50
04/28/2021	Filing Fee.	3.50
05/02/2021	Witness Fee.	6.16
05/03/2021	Filing Fee.	3.50
05/03/2021	Filing Fee.	3.50
05/04/2021	Filing Fee.	3.50
05/07/2021	Filing Fee.	3.50
05/14/2021	Filing Fee.	3.50
	Total Expenses	30.66
	Total Amount of this Bill	33,938.66
	Previous Balance	\$11,748.00

Payments

05/04/2021	Payment	-11,748.00
	Courtesy Credit	-10,000.00
	Balance Due	<u>\$23,938.66</u>
	Please Remit	<u>\$23,938.66</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after May 24, 2021 may not be reflected on this statement.

3. Payments Received after May 24, 2021 may not be reflected on this statement.

003731

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: June 29, 2021
Statement No. 59182
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
05/26/2021	AE	Review and respond to email from client [REDACTED] [REDACTED]	300.00	0.20	60.00
05/27/2021	AE	Email to client [REDACTED] [REDACTED]	300.00	0.20	60.00
	AE	Review minute order from Judge Perry; prepare letter to Adam regarding: same; email to Chalese [REDACTED] [REDACTED]	300.00	0.50	150.00
05/28/2021	AE	Revise and finalize letter to Adam regarding: summer timeshare		0.20	NO CHARGE
06/01/2021	AE	Review and respond to email from client [REDACTED] [REDACTED] email to Adam regarding: letter; email to client [REDACTED]	300.00	0.20	60.00
06/02/2021	AE	Review letter and email from Adam regarding: summer visitation; prepare letter to Adam regarding: additional custody time for Chalese	300.00	0.30	90.00
	AE	Prepare emergency motion regarding: summer timeshare	300.00	2.10	630.00
06/03/2021	JWF	Review and revise motion for clarification on summer timeshare.	400.00	1.25	500.00
	JWF	Review and revise application for order shortening time and order shortening time.	400.00	0.80	320.00
	AE	Prepare exhibit addendum to motion regarding: summer timeshare; prepare ex parte application for order shortening time and order shortening time on Adam's motion to disqualify; emails with client [REDACTED]	300.00	0.50	150.00
	AIR	Correspondence to Judge Bell's chambers enclosing our proposed Order shortening time for review and signature.		0.20	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 06/29/2021
Statement No. 59182
Page No. 2

			Rate	Hours	
06/04/2021	AIR	Preparation of Notice of Entry of Order Shortening Time; submission of same to District Court for filing; and service on opposing party and counsel.		0.20	NO CHARGE
06/07/2021	AE	Email [REDACTED]		0.20	NO CHARGE
06/14/2021	JWF	Emails with client [REDACTED]	400.00	0.40	160.00
06/21/2021	AIR	Preparation of Certificate of Service for the Notice of Hearing; submission of same to District Court for filing; and service on opposing party.		0.20	NO CHARGE
	AE	Prepare [REDACTED]	300.00	0.70	210.00
06/22/2021	JWF	Review and revise [REDACTED]	400.00	0.50	200.00
	JWF	Emails with client [REDACTED]		0.20	NO CHARGE
06/23/2021	JWF	Draft ex parte motion for leave to file reply.	400.00	0.40	160.00
	JWF	Email courtesy copy of ex parte motion to court.		0.20	NO CHARGE
06/24/2021	AIR	Preparation of Order Shortening Time; and submission of same to Judge for review and signature	180.00	0.20	36.00
	AIR	Teleconference [REDACTED] preparation of Certificate of Service for the Ex Parte Application for Order shortening time and submission of same to District Court for filing; and re-submission of the proposed Order shortening time to the Judge for review and signature.	180.00	0.20	36.00
	JWF	Emails with A. Solinger regarding proposed order; [REDACTED]	400.00	1.80	720.00
	JWF	Review trial video; draft proposed order from first day of trial; email to opposing counsel.	400.00	1.30	520.00
	JWF	Review chief judge decision on disqualification.	400.00	0.20	80.00
06/25/2021	JWF	Emails with client [REDACTED]	400.00	0.30	120.00
	JWF	Draft reply to opposition to emergency motion	400.00	1.20	480.00
	AIR	Correspondence to client [REDACTED]		0.20	NO CHARGE
	AIR	Correspondence to Judge's chambers submitting the proposed Order from the May 10th hearing without opposing party's or counsel's signatures.	180.00	0.20	36.00
	AIR	Correspondence [REDACTED]			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 06/29/2021
Statement No. 59182
Page No. 3

		Rate	Hours	
		180.00	0.20	36.00
JWF	Emails with client	400.00	0.30	120.00
AIR	Finalize Reply to Opposition and submission of same to District Court for filing; and service on opposing party.		0.20	NO CHARGE
	For Current Services Rendered		13.95	4,934.00

Expenses

06/03/2021	Filing Fee.	3.50
06/03/2021	Filing Fee.	3.50
06/04/2021	Filing Fee.	3.50
06/21/2021	Filing Fee.	3.50
06/23/2021	Process Server. John Wilks Process Serving	150.00
06/23/2021	Filing Fee.	3.50
06/24/2021	Filing Fee.	3.50
06/24/2021	Filing Fee.	3.50
	Total Expenses	174.50
	Total Amount of this Bill	5,108.50
	Previous Balance	\$23,938.66

Payments

06/01/2021	Payment	-14,500.00
06/01/2021	Payment	-9,438.66
	Total Payments	-23,938.66
	Balance Due	<u>\$5,108.50</u>
	Please Remit	<u>\$5,108.50</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after May 24, 2021 may not be reflected on this statement.

3. Payments Received after May 24, 2021 may not be reflected on this statement.

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PECOS LAW GROUP

BRUCE I. SHAPIRO

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(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: July 27, 2021
Statement No. 59496
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
06/26/2021	JWF	Outline opposition to motion for sanctions	400.00	1.70	680.00
	JWF	Finalize opposition to motion for sanctions.	400.00	2.30	920.00
06/27/2021	AIR	Review, revise and finalize Opposition to Motion for Sanctions, et al.; preparation of Opposition Fee Sheet; submission of same to District Court for filing; and service on opposing counsel.		0.40	NO CHARGE
06/28/2021	JWF	Review proposed order from April 30, 2021; review court correspondence regarding missing order and Order shortening time date.	400.00	0.20	80.00
	JWF	Email to client [REDACTED]	400.00	0.20	80.00
	AIR	Preparation of Notice of Entry of Order for Order shortening time on Emergency Motion regarding Summer Custodial Timeshare; submission of same to District Court for filing; and service on opposing counsel.		0.30	NO CHARGE
	JWF	Emails with client [REDACTED]	400.00	0.20	80.00
	AE	Prepare order on 4/30/2021 hearing; email to Adam with draft order	300.00	0.30	90.00
07/01/2021	JWF	Review opposing party requested revisions to April order.	400.00	0.20	80.00
	AIR	Revise the proposed Order from April 30th; and forward back to opposing party for signature.		0.20	NO CHARGE
	AIR	Correspondence with Adam Solinger regarding his requested revisions to the proposed Order from April 30th.	180.00	0.20	36.00
	AIR	Correspondence to Judge, enclosing the Order from April 30, 2021 Hearing for review and signature.		0.20	NO CHARGE

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 07/27/2021
Statement No. 59496
Page No. 2

			Rate	Hours	
07/06/2021	AIR	Preparation of Notices of Entry of Order for both, the Order from April 30, 2021 hearing and the Order regarding Temporary Orders from Summer 2021; submission of both to District Court for filing; and service on opposing party.	180.00	0.40	72.00
07/08/2021	AIR	Correspondence to client [REDACTED]	180.00	0.20	36.00
	JWF	Prepare for Hearing.	400.00	0.80	320.00
	JWF	Attend hearing.	400.00	0.70	280.00
	AE	Phone call with client [REDACTED]	300.00	0.20	60.00
	AE	Attend hearing with client and J. Fleeman via BlueJeans		0.70	NO CHARGE
07/20/2021	AIR	Correspondence to client [REDACTED]	180.00	0.20	36.00
		For Current Services Rendered		7.80	2,850.00

Expenses

06/25/2021	Filing Fee.	3.50
06/27/2021	Filing Fee.	3.50
06/28/2021	Filing Fee.	3.50
07/06/2021	Filing Fee.	3.50
	Total Expenses	14.00

Total Amount of this Bill 2,864.00

Previous Balance \$5,108.50

Payments

07/01/2021 Payment -5,108.50

Balance Due \$2,864.00

Please Remit \$2,864.00

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after July 25, 2021 may not be reflected on this statement.

3. Payments Received after July 25, 2021 may not be reflected on this statement.

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PECOS LAW GROUP

BRUCE I. SHAPIRO

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Chalese Solinger
curlyfriez09@gmail.com

Statement Date: August 24, 2021
Statement No. 59796
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
08/04/2021	BS	Email to client [REDACTED]		0.20	NO CHARGE
	AIR	Correspondence to client [REDACTED]			
		[REDACTED]	180.00	0.20	36.00
	AIR	Correspondence to client [REDACTED]			
		[REDACTED]	180.00	0.20	36.00
	JWF	Review [REDACTED] review emergency motion and exchange parte application for Order shortening time.	400.00	0.50	200.00
08/05/2021	AIR	Correspondence to District Court video/transcript services, requesting the video from the July 8, 2021 hearing.	180.00	0.20	36.00
	AE	Review minute order; emails with client [REDACTED]	300.00	0.30	90.00
	AE	Email to client [REDACTED] begin preparing declaration in response to Adam's emergency motion	300.00	0.50	150.00
	JWF	Emails with client, opposing party, draft opposition.	400.00	4.20	1,680.00
	JWF	Review court minute orders.		0.20	NO CHARGE
08/06/2021	AIR	Review, revise and finalize Opposition to Emergency Motion to Address Defendant's Intent to Withhold the Minor Children and Countermotion for Compensatory Time, Fees and Sanctions; preparation of Opposition fee information sheet; submission of same to District Court for filing and service on opposing party.	180.00	0.80	144.00
	AIR	Preparation of Errata to Defendant's Opposition and			

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 08/24/2021
Statement No. 59796
Page No. 2

			Rate	Hours	
		Countermotion; submission of same to District Court for filing; and service on opposing party.		0.50	NO CHARGE
	AIR	Preparation of initial draft of Chalese's updated Financial disclosure form.	180.00	0.50	90.00
	AE	Finish updated financial disclosure form; email to client [REDACTED]		0.20	NO CHARGE
08/11/2021	JWF	Review [REDACTED]	400.00	2.30	920.00
08/13/2021	AE	Email [REDACTED] to client		0.20	NO CHARGE
08/19/2021	AE	Email [REDACTED] client [REDACTED]		0.20	NO CHARGE
	AE	Email to client [REDACTED]		0.20	NO CHARGE
08/23/2021	JWF	Review opposing party reply.	400.00	0.40	160.00
	JWF	Emails with client; [REDACTED]	400.00	0.50	200.00
		For Current Services Rendered		10.60	3,742.00

Expenses

08/06/2021	Filing Fee.	3.50
08/06/2021	Filing Fee.	3.50
	Total Expenses	7.00

Total Amount of this Bill 3,749.00

Previous Balance \$2,864.00

Payments

08/01/2021	Payment	-2,864.00
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Balance Due \$3,749.00

Please Remit \$3,749.00

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after July 25, 2021 may not be reflected on this statement.

3. Payments Received after July 25, 2021 may not be reflected on this statement.

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PECOS LAW GROUP

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Chalese Solinger
curlyfriez09@gmail.com

Statement Date: September 28, 2021
Statement No. 60091
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours	
08/24/2021	AE	Review emails [REDACTED] from client; emails with client and Adam [REDACTED]	300.00	1.70	510.00
08/25/2021	AE	Emails to client and Adam [REDACTED]	300.00	0.60	180.00
	JWF	Review emails from A. Solinger; [REDACTED]	400.00	1.20	480.00
08/26/2021	JWF	Review and revise (with notes) [REDACTED]	400.00	0.80	320.00
	JWF	Emails with client [REDACTED]	400.00	0.30	120.00
	AE	Emails with client [REDACTED] email to client [REDACTED]	300.00	0.80	240.00
08/28/2021	SW	[REDACTED]	450.00	0.20	90.00
09/01/2021	AE	Review email from client [REDACTED] revise financial disclosure form; [REDACTED] finalize financial disclosure form	300.00	0.40	120.00
09/03/2021	AE	Emails to client [REDACTED]	300.00	0.20	60.00
09/07/2021	JWF	Emails with client [REDACTED]	400.00	0.40	160.00
09/09/2021	AE	Email to client [REDACTED]	300.00	0.20	60.00
09/13/2021	AE	Phone call [REDACTED]	300.00	0.20	60.00
	AE	Email to client [REDACTED]	300.00	0.20	60.00

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Chalese Solinger
 Account No. 1896.00
 RE: Divorce

Statement Date: 09/28/2021
 Statement No. 60091
 Page No. 2

			Rate	Hours	
	JWF	Prepare for call; [REDACTED]	400.00	0.30	120.00
09/14/2021	AE	[REDACTED] begin preparing for next day of trial	300.00	2.30	690.00
	JWF	Prepare for day two of trial, including preparation for motions pending.	400.00	4.70	1,880.00
09/15/2021	AE	Phone call [REDACTED]	300.00	0.20	60.00
	AE	[REDACTED] continue preparing for trial	300.00	1.40	420.00
09/16/2021	JWF	Emails with opposing party regarding expert testimony.	400.00	0.30	120.00
	AE	Email to client [REDACTED]		0.20	NO CHARGE
	AE	Finish preparing for second day of trial	300.00	0.90	270.00
09/17/2021	AE	Phone call with Dept. P regarding: continuing trial; appear at continuance hearing via BlueJeans; meet with client after appearance; phone call to client [REDACTED]	300.00	0.60	180.00
	AE	[REDACTED]	300.00	0.80	240.00
09/20/2021	AIR	Revise and update [REDACTED]	180.00	0.20	36.00
	AIR	Teleconference [REDACTED]	180.00	0.40	72.00
	AE	Emails with Adam regarding: Jessica testifying; [REDACTED] email to client	300.00	0.30	90.00
	AE	Prepare [REDACTED]	300.00	1.30	390.00
	AE	[REDACTED]	300.00	0.20	60.00
09/21/2021	JWF	Emails with opposing party and client [REDACTED] review and revise [REDACTED]	400.00	1.90	760.00
	AE	[REDACTED]	300.00	0.20	60.00
	AE	Email to client [REDACTED]	300.00	0.20	60.00
	AIR	Review, revise and finalize Emergency Motion for Immediate Withdrawal of Counsel; preparation of District Court Motion Fee Information Sheet; submission of Motion to District Court for filing; and service of same on all parties.	180.00	0.50	90.00

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Chalese Solinger
Account No. 1896.00
RE: Divorce

Statement Date: 09/28/2021
Statement No. 60091
Page No. 3

			Rate	Hours	
	JWF	Draft motion to withdrawal.	400.00	1.00	400.00
09/22/2021	BS	Telephone conference [REDACTED]		0.30	NO CHARGE
	AIR	Finalize Non-Opposition; submission of same to District Court for filing; and service on all parties.	180.00	0.30	54.00
	BS	[REDACTED]	575.00	0.25	143.75
	AE	Begin preparing non-opposition to order shortening time	300.00	0.20	60.00
	JWF	[REDACTED]		1.00	NO CHARGE
	JWF	Review opposing party Order shortening time; review and revise non-opposition to Order shortening time and opposition to facts within Order shortening time.	400.00	1.00	400.00
09/24/2021	AE	Email and phone call to client [REDACTED]	300.00	0.20	60.00
	AE	Prepare order to withdraw as counsel of record; submit same to Dept. P	300.00	0.30	90.00
		For Current Services Rendered		27.15	9,265.75

Expenses

09/01/2021	Filing Fee.	3.50
09/21/2021	Filing Fee.	3.50
09/22/2021	Filing Fee.	3.50
	Total Expenses	10.50

Total Amount of this Bill 9,276.25

Previous Balance \$3,749.00

Payments

09/01/2021	Payment	-3,749.00
------------	---------	-----------

Balance Due \$9,276.25

Please Remit \$9,276.25

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after September 24, 2021 may not be reflected on this statement.

3. Payments Received after September 24, 2021 may not be reflected on this statement.

003741

PECOS LAW GROUP

BRUCE I. SHAPIRO

8925 South Pecos Road, Suite 14A

Henderson, NV 89074

Email@PecosLawGroup.com

(702) 388-1851

Chalese Solinger
curlyfriez09@gmail.com

Statement Date: October 26, 2021
Statement No. 60406
Account No. 1896.00
Page: 1

RE: Divorce

Fees

			Rate	Hours
09/27/2021	AE	Email [REDACTED]		0.20 NO CHARGE
	AE	Prepare notice of entry of order to withdraw and finalize same		0.20 NO CHARGE

Expenses

09/27/2021	Filing Fee.	NO CHARGE
10/24/2021	Process Server. Carson Messenger Service Reno	NO CHARGE
	Previous Balance	\$9,276.25

Payments

10/05/2021	Payment	-9,276.25
	Balance Due	<u>\$0.00</u>

1. Please note your payment is due within 15 days from the date of this statement.

2. Services rendered and cost incurred after October 24, 2021 may not be reflected on this statement.

3. Payments Received after October 24, 2021 may not be reflected on this statement.

003742

ORDR

Adam M. Solinger
7290 Sea Anchor Ct
Las Vegas, Nevada 89131
Tel: (775) 720-9065
Email: attorneyadamsolinger@gmail.com
Plaintiff

Eighth Judicial District Court
Family Division
Clark County, Nevada

ADAM MICHAEL SOLINGER,)	Case No.: D-19-582245-D
)	
Plaintiff,)	Department: P
)	
vs.)	Date of Hearing: 4/14/22
)	Time of Hearing: 11:30 a.m.
CHALESE MARIE SOLINGER,)	
)	
Defendant.)	

ORDER FROM APRIL 14, 2022 MOTION HEARING

THIS MATTER came before this Court on the 14th day of April, 2022, Plaintiff, **Adam Michael Solinger** ("Adam"), present via BlueJeans; and Defendant, **Chalese Marie Solinger** ("Chalese") present and the Court being fully advised in the premises and good cause appearing makes the following findings and orders:

IT IS HEREBY ORDERED JOSHUA LLOYD shall not be allowed around the minor children Michael and Marie Solinger

THE COURT FURTHER ORDERS that the parties shall submit their closing briefs to the Court.

1 THE COURT FURTHER ORDERS that the decision hearing is
2 continued to May 26, 2022 at 11:30 a.m.

3 IT IS FINALLY ORDERED that Adam Solinger shall prepare the
4 order.

5
6
7
8 Dated this 9th day of May, 2022

9 

10 DISTRICT COURT JUDGE

11
12 45A 6B5 0756 6C67
Mary Perry
District Court Judge

13 Respectfully Submitted,

14 /s/ Adam M. Solinger
Adam M. Solinger
Plaintiff

15
16 Approved as to form and content.

17 /s/ Michancy Cramer
18 Michancy Cramer, Esq.
Attorney for Defendant.

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5/6/22, 1:44 PM

Gmail - Solinger v. Solinger Proposed Order April 2022



Adam S <attorneyadamsolinger@gmail.com>

Solinger v. Solinger Proposed Order April 2022

Michancy Cramer <michancy@glawvegas.com>

Fri, May 6, 2022 at 10:50 AM

To: Adam S <attorneyadamsolinger@gmail.com>

Cc: Alex Ghibaud <alex@glawvegas.com>, Charles Goodwin <charles@goodwinlawgroup.net>

You can submit with my e-signature.


Thanks,


M

On May 6, 2022, at 10:07 AM, Adam S <attorneyadamsolinger@gmail.com> wrote:

[Quoted text hidden]

2 attachments

 **D-19-582245-D - Minutes - All Pending Motions.pdf**
61K

 **Solinger_prop_ordr_apr22 (1).doc**
53K

<https://mail.google.com/mail/u/0/?ik=1aa7b9516b&view=pt&search=all&permmsgid=msg-f%3A1732100176205426015&simpl=msg-f%3A1732100176205426015> 1/1

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

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

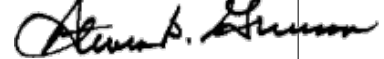
10
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 5/9/2022

15 Jack Fleeman	jack@pecoslawgroup.com
16 admin email	email@pecoslawgroup.com
17 Alicia Exley	alicia@pecoslawgroup.com
18 Adam Solinger	adam@702defense.com
19 Louis Schneider	lcsllawllc@gmail.com
20 Alex Ghibaudo	alex@glawvegas.com
21 Michancy Cramer	michancy@glawvegas.com
22 Adam Solinger	attorneyadamsolinger@gmail.com
23 Alex Ghibaudo	alex@glawvegas.com

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25
26
27
28



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

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

ADAM MICHAEL SOLINGER,

Plaintiff,

vs.

CHALESE MARIE SOLINGER,

Defendant.

Case Number: D-19-582245-D

Department P

ALEX GHIBAUDO P.C.'S MEMORANDUM OF FEES AND COSTS

Michancy M. Cramer, Esq., does hereby declare under penalty of perjury the following:

1. That she is an attorney duly licensed to practice law in the State of Nevada and is the attorney of record for Defendant, CHALESE SOLINGER ("Chalese") in the above captioned matter.

2. Alex Ghibaud, P.C. represented Chalese from December 2021 through

the present.

3. The total amount of attorney fees and costs incurred by Chalese during that time was \$10,000.

CALCULATION OF FEES

Alex Ghibaud, P.C. utilized a flat fee agreement in this case. In light of the flat fee agreement, a detailed accounting of time was not maintained by counsel.

The following activities were completed on behalf of Chalese in the course of representing her:

December 2021	<ul style="list-style-type: none">• Legal Assistant Crystal Reed organized and uploaded all pleadings and filings in the case for attorney review.• Attorney Cramer reviewed the entire case file from initial pleadings through the present procedural posture of the case.• Attorney Cramer prepared and filed a Request and Order for the expert reports and CPS records to be released to Alex Ghibaud, P.C. Said documents were reviewed upon receipt from previous counsel.
January 2022	<ul style="list-style-type: none">• Attorney Cramer met with the client several times in person and via telephone to prepare for trial.• Attorney Cramer met with witnesses to prepare for trial.• Attorney Cramer reviewed 5000+ pages of exhibits submitted by the Plaintiff.• Attorney Cramer reviewed Chalese's exhibits.• Attorney Cramer reviewed approximately 2 hours of video from the previous trial dates.• Attorney Cramer attended one (1) day of trial
February 2022	<ul style="list-style-type: none">• Attorney Cramer had several meetings with client and witnesses• Attorney Cramer communicated with Chalese's rebuttal witness several times to ensure his availability for trial

	<ul style="list-style-type: none"> • Attorney Cramer completed a full review of all videos of trial dates prior to March 2022
March 2022	<ul style="list-style-type: none"> • Attorney Cramer represented Chalese for three (3) days of trial • Attorney Cramer met with client and witness • Attorney Cramer prepared and filed a Motion to Place on Calendar and Take Testimony • Attorney Cramer prepared and filed a Motion for an OST and an OST
April 2022	<ul style="list-style-type: none"> • Attorney Cramer met with client and witness • Attorney Cramer represented Chalese at a motion hearing • Attorney Cramer communicated several times with witnesses and other attorneys • Attorney Cramer received and responded to threatening emails from opposing party regarding his allegations

BRUNZELL ANALYSIS

The Nevada Supreme Court ruled that disproportionate income is a basis for an award of attorney fees and costs so that the lower earning spouse can meet the other party in court on an “equal basis.” *Sargeant v. Sargeant*, 88 Nev. 223, 495 P.2d 618 (1972).

Pursuant to the Court’s ruling in *Miller v. Wilfong*, 121 Nev. 619, 624, 119 P.3d 727, 730 (2005) (citing *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969)), the Court requires trial courts to evaluate certain factors when deciding an award of attorney fees. Those factors applied to the present case are:

1. The Qualities of the Advocate:

1 Chalese's attorney, Michancy M. Cramer, Esq., has been a Nevada licensed
2 attorney since 2009 and has actively practiced in various courts in Southern
3 Nevada since that time. She has been lead counsel on numerous cases and has
4 prevailed when taking such matters to trial. She has a very good professional
5 standing in the community and is a strong advocate for her client.
6
7

8 2. The Character and Difficulty of the Work Performed:
9

10 There was significant time and skill devoted to the handling of the matter
11 presently before this Court, including but not limited to, preparing for a trial
12 without any previous knowledge of the facts and circumstances of this case,
13 hours and hours spent reading the complete history of the case filings, trial
14 preparation, interviews with the client and witnesses, court appearances, and
15 drafting filings.
16
17

18 3. The Work Actually Performed:
19

20 The Court can clearly see that the work required in this matter will have earned
21 Counsel every hour billed. Counsel took over this case in the middle of trial,
22 was able to effectively cross examine Plaintiff's expert, presented testimony
23 from a rebuttal expert, and presented evidence over numerous days of trial.
24 Counsel charges \$350/hour, though a flat fee was charged in this case, which
25 is very reasonable considering most attorneys in the Las Vegas area charge
26
27
28

1 between \$250-\$600/hour. The Court must also consider that Chalese's
2 attorney has over a decade of experience and is an effective litigator.
3

4 4. The Results Obtained:
5

6 Chalese is entitled to an award of fees in this case. The evidence submitted at
7 trial, including over 5,000 pages of Plaintiff's exhibits which Chalese
8 stipulated to the admission of, did not come close to justifying the Plaintiff's
9 years of scorched earth litigation. Chalese was awarded joint legal and joint
10 physical custody of her children, which is all she has ever asked for in this
11 matter.
12

13
14 It cannot go unmentioned that there is a significant disparity of income in this
15 case as the Plaintiff is a practicing attorney who lives with his legal researcher
16 girlfriend. Chalese married Plaintiff when she was barely out of high school. She
17 was a housewife and mother through most of the marriage and now works in a salon
18 cutting hair for children.
19
20

21
22 I declare under penalty of perjury under the laws of the State of Nevada that
23 the facts in the foregoing memorandum are true and correct.
24

25 /s/ Michancy M. Cramer
26 Michancy M. Cramer, Esq.
27
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Pursuant to NRC 5(b), I declare under penalty of perjury, under the law of the State of Nevada, that I served a true and correct copy of *Memorandum of Fees and Costs*, on May 11, 2022, as follows:

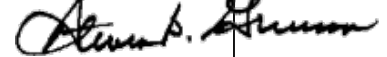
- [x] Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D), and Administrative Order 14-2 captioned “*In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court*,” by mandatory electronic service through the Eighth Judicial District Court’s electronic filing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

To the following address:

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

//s//Michancy M. Cramer

Alex Ghibaudo, P.C.
Attorneys for Defendant



MOT

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

Eighth Judicial District Court
Family Division
Clark County, Nevada

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

**MOTION TO RECONSIDER DECISION AFTER DEFENDANT'S
MOTION TO PLACE ON CALEDNAR AND TAKE TESTIMONY**

NOW INTO COURT comes Plaintiff, ADAM MICHAEL SOLINGER, and hereby submits his motion to reconsider the Court's decision to do nothing after the incident involving Josh.

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

Dated Friday, May 13, 2022.

Respectfully Submitted,

/s/ Adam M. Solinger

Adam M. Solinger

1 NOTICE: YOU MAY FILE A WRITTEN RESPONSE TO THIS
2 MOTION WITH THE CLERK OF THE COURT AND PROVIDE THE
3 UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN 14 DAYS
4 OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN
5 RESPONSE WITH THE CLERK OF THE COURT WITHIN 14 DAYS OF
6 YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED
7 RELIEF BEING GRANTED BY THE COURT WITHOUT A HEARING
8 PRIOR TO THE SCHEDULED HEARING DATE.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3 Adam would refer the Court to the statement of facts contained in
4 Defendant's original motion to place on calendar.

5 At the hearing, Adam expressed concerns that the Defendant was
6 not cooperating with the CPS investigation. Defendant rebutted this
7 concern by making a representation through counsel that she had been in
8 contact with CPS, that Adam did not know how CPS works, and someone
9 had expressed concerns over the concerns Michael had expressed being
10 too consistent and therefore the result of coaching.

11 Immediately after the hearing at 12:04 PM, Adam spoke with the
12 CPS investigator Maxine Doggett. Doggett confirmed that she was the
13 only investigator on the case, that she had been to the Defendant's house
14 twice to try to talk to her, and that she had left voicemails asking for a call
15 back that had not been returned. Doggett then called Adam back at 12:09
16 PM to inform him that the Defendant had finally called her back and is
17 scheduled to meet with Doggett on Monday April 18, 2022.

18 Adam attempted to confer with opposing counsel based upon these
19 misrepresentations that had been proffered in court to ask that counsel
20 voluntarily correct the record and counsel's response was as follows:
21

1 Adam,

2 I represented to the court what my client
3 represented to me. I made it very clear to the
4 court that my representations were an offer of
5 proof and my motion offered to put my client
6 on the stand so that the court could take
7 testimony under oath if it had seen fit to do so.
8

9 I realize that you have little to no experience
10 with CPS and it is clear to me that you don't
11 know what you are talking about; nor do you
12 understand how CPS operates.
13

14 I am neither impressed nor intimidated by
15 your threats. Do what you need to do.
16

17 M

18 Adam met with Doggett on Monday April 18, 2022 at his house as
19 he represented in Court. Doggett shared with Adam the basis for her
20 investigation which resulted from a referral involving 2 incidents. The
21 Court is already familiar with the domestic violence incident as that was

1 the basis of the Defendant's motion. The other incident, that Adam was
2 not aware of until Doggett shared it with him involved Josh keeping
3 Chalese and the children in the vehicle while it was running in the garage
4 with the doors closed in an attempt to commit mass murder and suicide.
5 Doggett then interviewed Michael and Marie. Michael told Doggett
6 during his interview that there had been another incident wherein the
7 Defendant told Michael that Josh had hit the Defendant over the head
8 with a laptop and it had left a "goose egg."

9 Additionally, since the date of the hearing, Josh was scheduled for a
10 preliminary hearing related to the domestic violence charges. The
11 Defendant elected not to show up to the preliminary hearing which caused
12 the case to be dismissed. To make matters worse, the Defendant chose to
13 gloat over the fact that the case had been dismissed by messaging Adam
14 the day she chose not to go to court and said "Just letting you know the
15 [tpos] against Josh all got dropped today."

16 This comports with what the children have been saying. Specifically,
17 they have been telling Adam that Josh will be coming back as soon as the
18 "schedule person" makes a change. The children have used the term
19 "schedule person" to refer to this Court when explaining that Chalese has
20 told them that they can go in front of the schedule person when they are
21 older to declare who they wish to live with.

1 **II. LAW AND ARGUMENT**

2 EDCR 5.513 permits a party to seek reconsideration of a ruling
3 within 14 days of the notice of entry of order being filed. Reconsideration
4 is appropriate where substantially different evidence is subsequently
5 introduced or the decision is clearly erroneous. *See Masonry & Tile*
6 *Contractors Ass'n v. Jolley, Ursa, & Wirth, ltd.*, 113 Nev. 737, 741 (1997).

7 Both provisions apply here. First, the Defendant clearly lied to this
8 Court through counsel. Adam will attempt to order the CPS records before
9 any hearing on this motion to reconsider occurs, but the Court can order
10 them much quicker and then disclose them under a gag order as has
11 previously been done in this case. For the record, the CPS case number is
12 1458774. Additionally, the new incident involving Josh where he tried to
13 murder everyone and commit suicide is deeply troubling. Especially in
14 light of the Defendant stopping just short of saying she was getting back
15 together with Josh, not showing up to the preliminary hearing so that the
16 criminal case would be dismissed, and then gloating over the fact that
17 everything had been dropped.

18 A full CPS investigation is ongoing. This Court's decision to do
19 nothing based upon these incidents is disturbing. This Court has one
20 obligation and that is to decide the best interest of the children.
21 Throughout the presentation of this case, this Court has done everything

1 possible to making rulings that mitigate the Defendant's constant inability
2 to put the children first. These rulings involve the severe limiting of
3 evidence that may be presented, holding that certain actions of the
4 Defendant are too aged to be relevant, holding that the Defendant is not
5 to use marijuana when she has the children but putting zero enforcement
6 mechanism into place, and numerous other examples.

7 Perhaps most telling of the Court's bias to award joint custody, at all
8 costs, is the Court's threat to find that a motion Adam filed through his
9 prior attorney, that was granted by the previous judge in this case,
10 somehow represented domestic violence under the child custody statute
11 such that this Court could make a finding that Adam could only have
12 visitation. This is such a ridiculous position that is made even more
13 ridiculous by the current situation whereby an actual extreme act of
14 domestic violence and attempted murder, on two separate occasions, has
15 now been committed against the children. Instead of waiting to see what
16 happens with CPS, this Court wants to treat this case like a car accident
17 where the facts are frozen in time. Nothing could be more inappropriate.

18 It seems that the Court desires to issue a final order for the sake of
19 issuing a final order without due consideration for what is actually best
20 for the children. This was emphasized throughout the trial by the Court's
21 repeated attempts to coerce settlement through a barrage of threats

1 including the aforementioned threat to find that filing a motion was an act
2 of domestic violence, that Adam had to prevail and be awarded primary
3 custody at trial to avoid paying attorney's fees, or the Court's off record
4 admonition that it knew how to craft an order that would withstand
5 appellate scrutiny.

6 If ever there was a time to pause and give something due
7 consideration, this is it. Chalese lied to this Court about her contact with
8 CPS, the steps she was taking to protect the children, and that Michael's
9 concerns were too consistent and therefore the result of coaching.
10 Additionally, the new murder/suicide situation and other domestic
11 violence incident involving a laptop has come to light and demonstrates
12 the absolute dangerousness of this situation. Of note as well, there was
13 previously testimony about how the Defendant and the Children had to
14 flee their home and stay in a trailer in the middle of the night when Josh
15 had been served a subpoena and was angry. This is not the time to rush to
16 judgment for the sake of rushing to judgment.

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

18 Adam attempted to resolve this as set forth above and counsel's
19 response was to "do what you need to do."

20 ///

21 ///

1 **IV. CONCLUSION**

2 Based upon the foregoing, Adam respectfully requests that this
3 Court reconsider its decision to forge ahead towards issuing a final order
4 and withhold a final decision until such time as the situation becomes
5 more clear.

6 Dated Friday, May 13, 2022.

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8 Respectfully Submitted:

9 /s/ Adam M. Solinger
10 Adam M. Solinger
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DECLARATION OF ADAM MICHAEL SOLINGER

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

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

2. I make this affidavit in support of the foregoing **MOTION TO RECONSIDER DECISION AFTER DEFENDANT’S MOTION TO PLACE ON CALEDNAR AND TAKE TESTIMONY**

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

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

Dated Friday, May 13, 2022.

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION TO RECONSIDER
DECISION AFTER DEFENDANT’S MOTION TO PLACE ON
CALEDNAR AND TAKE TESTIMONY**

was filed electronically with the Eighth Judicial District Court in the
above-entitled manner, on May 13, 2022. Electronic service of the
foregoing document shall be made in accordance with the Master Service
List, pursuant to NEFCR 9, as follows:

Michancy Cramer, Esq.
Attorney for Defendant

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

MOFI

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

ADAM MICHAEL SOLINGER

Plaintiff/Petitioner

v.

CHALESE MARIE SOLINGER

Defendant/Respondent

Case No. D-19-582245-D

Dept. 1

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

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

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

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

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

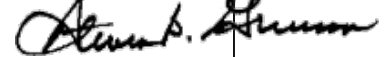
<input checked="" type="checkbox"/>	\$0	The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
<input checked="" type="checkbox"/>		The Motion/Opposition is being filed in a case that was not initiated by joint petition.
<input type="checkbox"/>		The party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

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

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

Party filing Motion/Opposition: Adam M. Solinger Date 10/7/2020

Signature of Party or Preparer /s/ Adam M. Solinger



1 **EPAP**

Adam M. Solinger
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Eighth Judicial District Court
Family Division
Clark County, Nevada

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

**EX PARTE APPLICATION FOR AN ORDER SHORTENING
TIME ON PLAINTIFF'S MOTION TO RECONSIDER DECISION
AFTER DEFENDANT'S MOTION TO PLACE ON CALEDNAR
AND TAKE TESTIMONY**

NOW INTO COURT comes Plaintiff, ADAM MICHAEL
SOLINGER, and respectfully moves that, pursuant to EDCR 5.513, the
Court shorten time in which to hear Plaintiff's MOTION TO
RECONSIDER DECISION AFTER DEFENDANT'S MOTION TO PLACE
ON CALEDNAR AND TAKE TESTIMONY.

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1 This application is made and based on all the papers and pleadings
2 on file herein and the declaration of counsel attached hereto. Attached as
3 an exhibit is the proposed order shortening time.

4 Dated Wednesday, May 18, 2022.

5 Respectfully Submitted,

6 /s/ Adam M. Solinger

7 Adam M. Solinger
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1 **DECLARATION OF ADAM MICHAEL SOLINGER**

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

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

7 2. In essence, this motion to reconsider requests that this Court
8 continue a final decision and order in this case until such time as the
9 situation with Josh and Chalese becomes clearer and the CPS
10 investigation is completed and closed.

11 3. As more fully set forth in the underlying motion, additional
12 facts have come to light since the hearing.

13 4. Chiefly, the Defendant decided not to show up to the
14 preliminary hearing which resulted in the charges against Josh being
15 dismissed.

16 5. That same day, the Defendant felt it wise to send a message
17 to me letting me know that the TPO against Josh had been dropped.

18 6. Additionally, the CPS investigation revealed that another
19 concern had been reported by someone that Josh had started the car in
20 the garage with the Defendant and the children in the car in an attempt
21 to murder them and kill himself.

7. An order shortening time is necessary because what happens with Josh now that he is not restrained by a TPO and the Defendant's obvious desire to reunite with Josh can drastically impact the children and it is nonsensical to rush to enter a final order given this mercurial situation.

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

Dated this Wednesday, May 18, 2022.

/s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

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EXHIBIT A

1 **OST**

Adam M. Solinger

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4 Eighth Judicial District Court

5 Family Division

Clark County, Nevada

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

7 Plaintiff,) Department: P

8 vs.)

9 CHALESE MARIE SOLINGER,)

10 Defendant.)

11 **ORDER SHORTENING TIME ON PLAINTIFF'S MOTION TO**
12 **RECONSIDER DECISION AFTER DEFENDANT'S MOTION TO**
13 **PLACE ON CALEDNAR AND TAKE TESTIMONY**

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1 Upon application of Plaintiff and good cause appearing therefore:
2 **IT IS HEREBY ORDERED** that the time for hearing on
3 **PLAINTIFF’S MOTION TO RECONSIDER DECISION AFTER**
4 **DEFENDANT’S MOTION TO PLACE ON CALEDNAR AND**
5 **TAKE TESTIMONY**
6 is hereby shortened and shall be heard on the ____ day of
7 _____, 2022 at the hour of _____ in Department P
8 (Courtroom #13)/(via Video Conference (Bluejeans)) of the Family Court,
9 located at 601 N. Pecos Rd., Las Vegas, NV 89101.
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15 Respectfully Submitted by:
16 Plaintiff

17 /s/ Adam M. Solinger
18 Adam Solinger
19
20
21



1 **BRF**

2 Michancy M. Cramer
3 Nevada Bar Number: 11545

4 **ALEX GHIBAUDO, PC**
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11
12 **EIGHTH JUDICIAL DISTRICT COURT**
13 **FAMILY DIVISION**
14 **CLARK COUNTY, NEVADA**

15 ADAM MICHAEL SOLINGER,

16 Plaintiff,

17 vs.

18 CHALESE MARIE SOLINGER,

19 Defendant.

Case Number: D-19-582245-D

Department P

20 **DEFENDANT'S CLOSING BRIEF**

21 **COMES NOW** Defendant, CHALESE SOLINGER (“Chalese”) and hereby
22 submits the following *Closing Brief*.

23 It is typical that the Plaintiff, ADAM SOLINGER (“Adam”) should be the
24 first to submit or present his closing brief, but the date set for the Court’s opinion is
25 fast approaching and Adam has not yet filed or served his closing brief. Therefore,
26 Chalese is presenting hers with the understanding that she may submit a reply to
27 Adam’s if and when he submits his own.
28

1 This case is a divorce and custody case. There are two (2) minor children, to
2 wit: Michael Adam Solinger, born June 16, 2015 an Marie Leona Solinger, born
3 August 28, 2017. The parties were married on May 12, 2012 and have been married
4 for ten (10) years. While the parties have divided most of their property, there is
5 still community property to adjudicated.
6

7 LITIGATION

8
9 To say this case has been over litigated would be an understatement. Since
10 filing his initial Complaint, Adam has litigated just about everything that could
11 possibly be litigated in this case and then some. Adam has filed motion upon
12 motion upon motion. Even now, at the conclusion of trial and before the Court has
13 even issued its opinion, Adam has yet another motion pending.
14

15 Adam has repeatedly threatened to appeal this action and there is no doubt
16 he will follow through on that threat. Adam has also threatened Chalese's
17 attorneys. Previous counsel, Pecos Law Group, would not even release the expert
18 reports and CPS records in this case until a *Request and Order* was submitted to
19 the Court authorizing them to do so. The reason for that was that Adam had
20 repeated threatened or inferred threats to file complaints with the State Bar and to
21 file for sanctions against the attorneys handling this matter. He has done the same
22 to present counsel. His pending motion includes a quote of this writer's email to
23 him, but conspicuously does not attach the actual email thread. More likely than
24 not, the reason for that is that, once again, Adam is insinuating that he is going to
25 file a complaint or file for sanctions against Chalese's attorney, this writer.
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1 Adam's ire is not restricted to counsel. In 2021, after the first day of trial on
2 May 10, 2021, Adam filed a motion to disqualify this Court from hearing the
3 matter any further. That matter took time to resolve because it had to be heard and
4 decided before the case would continue. Given the case load of the family court
5 departments, trial didn't recommence until near the end of the year. Following the
6 trial date in January of this year, Adam again asked that the Court recuse itself. In
7 Adam's pending motion, he openly accuses the Court of having a bias in favor of
8 joint physical custody. His allegations against the Court completely disregard the
9 fact that joint custody is the preference of the State of Nevada as set forth by the
10 Legislature in the Nevada Revised Statutes (NRS), Chapter 125C. Basically,
11 Adam is accusing the Court of having a bias for following the law which is
12 certainly a novel legal argument, but clearly not rooted in reality or the
13 jurisprudence traditions of this State and Country.

14 Adam is a vexatious litigant and has attempted to use his position as an
15 attorney as well as the resources of his wealthy family to erase Chalese from their
16 children's lives. After over three (3) years, countless motions, over 5,000 pages of
17 exhibits that Chalese consented to the admission of, and a lengthy, multiple-day
18 trial, Adam was never able to prove his case. Astoundingly, the sum of his
19 argument for primary physical custody of the children amounted to a single
20 allegation that Chalese drove over 100 miles per hour with Marie in the car¹, that
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27 ¹ Adam's private investigator that testified to this incident was unable to identify the
28 driver of the vehicle and admitted to losing sight of the vehicle on the freeway.

1 the children were returned to him with dirty fingernails, and some incidents
2 regarding Chalese's boyfriend that took place largely due to the antagonistic
3 behavior of Adam and his girlfriend. The children have never been injured by
4 Chalese, they have always been safe and cared for in her custody, they love their
5 mother, and they are entitled to a relationship with BOTH of their parents. Adam
6 failed to prove anything otherwise. After all the filings, all the experts, the years of
7 litigation, and hundreds of thousands of dollars in legal fees, Adam has simply
8 failed to overcome this State's preference for joint custody.

11 **LEGAL FEES**

12 Pursuant to *Sargeant v. Sargeant*, 88 Nev. 223, 227, 495 P.2d. 618 (1972),
13 Chalese is entitled to an award of fees and costs. Not only is Adam a licensed,
14 practicing attorney, but he also has the resources of his wealthy doctor father and
15 nurse practitioner mother, which he has most certainly availed himself of in this
16 litigation. At the commencement of this case, Adam was making approximately
17 \$125,000 per year as a private criminal defense attorney and Chalese was a
18 housewife. Adam took a job making less money and currently works at the
19 Attorney General's office making approximately \$90,000 per year. Chalese works
20 as at a children's salon, cutting hair for children and making approximately \$11 per
21 hour plus tips.

22 Adam's position in this case has been unreasonable. He admitted in his
23 deposition that he wanted his girlfriend, Jessica, to replace Chalese as the mother
24 of the children. He was unable to prove in any way, shape, or form that Chalese is

1 not a fit mother. Even his most recent calls to Child Protective Services (CPS)
2 were unsubstantiated. After all the money Adam spent having Chalese followed
3 by his army of private investigators, he was unable to show the Court anything
4 indicating that Chalese had done anything contrary to the best interests of the
5 children. He has failed to prove that the statutory preference for joint physical and
6 legal custody of the children is not in their best interests.
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9 When Adam did not get his way in Court, he would simply file another
10 motion and take Chalese back to Court. As this Court pointed out, it would have
11 been alerted if Chalese did anything because Adam would have filed another
12 motion. He has filed over and over and over regarding the most mundane details.
13 His predatory litigation tactics have driven Chalese's legal fees into the hundreds
14 of thousands of dollars.
15

16 Chalese was originally awarded \$10,000 in legal fees, but that order was
17 stayed until the end of the case. Since then, her legal fees have ballooned due to
18 Adam's constant filings. She has had to pay for numerous depositions, experts,
19 and attorneys just to protect herself and her role as Michael and Marie's mother
20 against Adam's relentless and frivolous attacks.
21

22 Chalese should be granted her legal fees in full.
23

24 **CUSTODY**

25 The parties should be granted Joint Legal and Joint Physical Custody of the
26 minor children. Adam, despite having years to litigate this matter and nearly
27 unlimited resources, has failed to overcome the statutory preference for joint custody
28

1 as set forth in NRS Chapter 125C.

2 NRS 125C.0035 provides that in making a custody determination, the “sole
3 consideration of the court is the best interest of the child.” Applying the best interest
4 factors, as set forth in NRS 125C.0035(4), to this case demonstrates that there is no
5 justification for Adam’s position regarding custody.
6

7 (a) **The wishes of the child if the child is of sufficient age and capacity**
8 **to form an intelligent preference as to his or her physical custody.**

9
10 Not applicable; the children in question are not of sufficient age to form an
11 intelligent decision in this case.

12 (b) **Any nomination of a guardian for the child by a parent.**

13
14 Not applicable.

15 (c) **Which parent is more likely to allow the child to have frequent**
16 **associations/continuing relationship with the noncustodial parent.**

17
18 The best evidence regarding this factor is the Register of Actions in this case.
19 Chalese does not need to argue this because Adam has done it for her. He has spent
20 years and hundreds of dollars attempting to take the children from her. He has filed
21 motion after motion seeking to restrict her time and relationship with the children.
22 Adam has essentially admitted that he is seeking to replace Chalese with his
23 girlfriend. On the other hand, Chalese has always sought a joint custody order. She
24 has never tried to withhold the children or take them away from Adam. This factor
25 strongly favors Chalese.
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1 **(d) The level of conflict between the parties.**

2 Like the previous factor, the Register of Actions is the best evidence regarding
3
4 the level of conflict between these parties. Chalese cannot even breathe without
5 Adam filing a motion. The Court can see from the thousands of pages of exhibits
6 that Adam submitted that he routinely scrolls the social media profiles of her and her
7 friends and family, printing random posts and then submitting them as “evidence”
8 that Chalese should lose her children. He has fought to restrict her ability to make
9 decisions regarding her children. He has tried to take away as much time from her
10 as he can. He has excluded her completely from decisions regarding the medical
11 and educational care of the children. This factor strongly favors Chalese.
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15 **(e) The ability of the parents to cooperate to meet the needs of the child.**

16 Adam does not cooperate with Chalese at all. He has made unilateral
17 decisions regarding which school the children attend, what programs they will go to,
18 who is allowed to babysit them, and what medical providers they will see. He does
19 not include Chalese in any of it other than to inform her of his and Jessica’s decisions
20 after the fact.
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23 Early on in this case, Adam was very adversarial towards Chalese in dealing
24 with the children’s health issues and he does not appear capable of cooperating with
25 her. Chalese had been a stay-at-home mother and been the primary caregiver of the
26 children so she had firsthand knowledge of their health issues as well as their
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1 doctors' recommendations for care. Adam disregarded her and repeatedly fought
2 with her, in and out of court, regarding their care. This factor strongly favors
3 Chalese.
4

5 (f) **The mental and physical health of the parents.**
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7 It appears that both parents are relatively healthy, though Adam could benefit
8 from some co-parenting coaching and possibly family counseling with Chalese so
9 that he can learn to effectively co-parent. Chalese did have difficult pregnancies
10 with all three of her children, but those issues appear to have resolved with time.
11 This factor appears to be neutral.
12

13 (g) **The physical, developmental, and emotional needs of the children.**
14

15 Michael and Marie are entitled to a relationship with BOTH of their parents
16 and their little sister. They do not need to be put in the middle of Adam's animus
17 towards their mother and should be shielded from it at all costs. This factor favors
18 Chalese in that Adam has consistently sought to eliminate her from their lives
19 throughout these proceedings.
20

21 (h) **The nature of the relationship of the child with each parent.**
22

23 Although the children are very young, they appear to love both of their
24 parents. This factor is likely neutral.
25

26 (i) **The ability of the child to maintain a relationship with any sibling.**
27

28 Chalese has had a child since these proceedings commenced. Michael and

1 Marie's relationship with their little sister should be honored and protected. This
2 factor favors Chalese.

3
4 **(j) Any history of parental abuse or neglect of the child or a sibling.**

5 Despite the numerous allegations and calls to CPS by Adam and his family
6 and/or associates, there is no abuse or neglect of either child. All of the calls to CPS
7 Adam has made against Chalese have been unsubstantiated.

8
9 The above factors demonstrate that there is no substantive reason for any order
10 other than Joint Legal and Joint Physical Custody. Adam has failed in his baseless
11 and mean-spirited quest to take the children away from Chalese. In fact, under the
12 above factors, Adam's intransigence and shameless attempts to exclude Chalese
13 from Michael and Marie's lives are arguably grounds to find that Chalese should be
14 granted MORE custodial time than Adam to counteract his influence over them and
15 his animus towards Chalese.
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19 **PROPERTY**

20 Although the parties have divided most of their property, including vehicles
21 and personal effects, there are still several pieces of community property to be
22 adjudicated.
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24 **Marital Residence**

25 The marital residence was purchased with assistance from Adam's wealthy
26 father. Although Adam now wants to argue that he is entitled to a disproportionate
27 division of the proceeds of the marital residence due to the assistance of his father,
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1 the analysis is not so simple.

2 “All property acquired after marriage is presumed to be community
3 property. This presumption may be rebutted with clear and convincing evidence.”
4 *Forrest v. Forrest*, 99 Nev. 602, 604 (Nev. 1983). “[Community] property and
5 debt must be divided in accordance with the law. NRS 125.150(1)(b) requires the
6 court to make an equal disposition of property upon divorce, unless the court finds
7 a compelling reason for an unequal disposition and sets forth that reason in
8 writing.” *Blanco v. Blanco*, 311, P.3d 1170, 1175 (Nev. 2013).

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12 In the present case, Adam’s father gave them a gift of equity in the marital
13 residence so that Adam and Chalese could purchase the marital residence. Adam
14 now argues that the gift was his separate property and he is entitled to the entirety
15 of it. However, that is an overly simplistic view of community property. All
16 Adam’s father did was execute a one page, boilerplate form provided by the title
17 company to explain where the substantial down payment (in the form of equity)
18 was coming from. This is quite common in the purchase of real property. One
19 cannot simply purchase a home and plop down a stack of cash without explaining
20 in the closing documents where that money came from. It does not take much
21 imagination to see why. Without such a requirement, real estate would be rife with
22 money laundering and mysterious infusions of cash from various criminal
23 elements.

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28 There was never any other document indicating that the parties agreed that

1 the marital residence was not entirely community property. In fact, the deed was
2 executed granting the entirety of the property FROM Adam's parents TO Adam
3 and Chalese, which is a clear indication that the home was NOT purchased as a
4 mix of community and separate property, but rather as the marital residence,
5 subject to equal division. In further support of this, it is noteworthy that the gift of
6 funds form says the money is from Adam's father solely, but the deed indicates
7 that the house is deeded from both his mother AND his father. In light of the fact
8 that the gift, in the form of equity, clearly came from both parents as they were the
9 owners of the home and the equity in it, if the document was actually intended to
10 be a legal document and meant as a separate property gift, it would have included
11 BOTH parents. The fact that Adam and his father quickly slapped together a
12 boilerplate gift of funds form which they were the only signers on indicates that it
13 was pro facto just a piece of paper needed to check a box on the mortgage
14 documents and not an actual gift intended as separate property.
15

16 Adam and his father have demonstrated quite effectively that Adam has
17 nearly unlimited resources when it comes to legal matters. Adam has employed
18 some of the premier family law attorneys in the community as his co-counsel in
19 this case. He has paid for expert reports and an army of private investigators to
20 follow and harass Chalese. If Adam and his father truly intended that the gift of
21 equity in the residence was to be his sole and separate property, they surely could
22 have retained counsel to draft the appropriate documentation indicating as much.
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1 They chose not to.

2 Further illustrative of the intentions regarding the marital residence is
3 Adam's current residence. His parents bought that house and then transferred it to
4 Adam's girlfriend. No doubt Adam's parents are not just going out buying huge
5 homes for Adam's girlfriends. The house is clearly Adam and Jessica's property
6 together, but was put in Jessica's name to safeguard it against any community
7 property claim from Chalese.
8

9 The entirety of the facts in this case, including Adam and Jessica's current
10 home situation, demonstrate that the marital residence was deeded to Adam and
11 Chalese as a couple, as their community property. The single page, source of
12 funds from their closing documents is not dispositive of this matter. Taken as
13 a whole, the facts of the case and the actions of the involved parties indicate that
14 the marital residence as a whole was intended as community property and Adam
15 has failed to overcome the presumption set forth by the Supreme Court in *Forrest*.
16 The remaining funds from the sale of the marital residence should be divided equally
17 as those funds are community property.
18

19 **Retirement and Bank Accounts**

20 Adam currently works for the Attorney General's office and has a PERS
21 account. Chalese requests her community interest in that PERS account pursuant
22 to the time rule as set forth in *Gemma - Fondi*. Were something to happen to
23 Adam, Chalese would be the sole parent to Michael and Marie and therefore
24

1 Chalese is asking this Court to order that Adam select Option 2 with regard to his
2 PERS survivorship benefit and that she be named the sole beneficiary. In light of
3 their disparity in incomes, Chalese requests that the QDRO be prepared at Adam's
4 sole expense. Further, Chalese requests that the McFarling Law Group be retained
5 for the drafting of the QDRO.
6

7
8 Adam has a bank account with Bank of America, account number ending in
9 9724. It is unknown how much is in that account and Adam has previously
10 indicated that he intends that account to be his; however, the account contains
11 community property and Chalese is entitled to her one-half community interest in
12 it. On February 3, 2022 this writer sent an email to Adam's co-counsel, Charles
13 Goodwin, Esq., indicating that Chalese intended to keep her community interest in
14 that account. It is also believed that the Court ended the community in November
15 of 2021, prior to this writer's representation. Chalese asks that the Court award her
16 one-half of the highest balance of that account in November of 2022 at a minimum.
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20 Chalese has a Charles Schwab account ending in 8846 that is mostly empty
21 and has been for years. Chalese has simply kept the account open because of the
22 JPI and because she did not want to go through the legal wranglings with Adam to
23 get it closed. It is believed to have a balance of a few dollars at most. That
24 account should be equally divided between the parties if there is more than a de
25 minimis amount in it.
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1 him and refused to discuss why Adam was outside their home demanding the
2 children on Chalese's custodial day, Josh got aggravated and there was a verbal
3 altercation. Then, during the TPO, Jessica blocked Josh and Chalese's driveway.
4 When Josh told her to move (using some choice language to do so), Jessica, with her
5 camera at the ready, called the cops and reported him as a violation of the TPO. In
6 light of the conflict in this case, it is pretty obvious that Jessica was antagonizing
7 Josh and he fell for it. That reflects poorly on both of them.
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10 There was an incident at Chalese and Josh's home after the trial in this matter
11 concluded, but before final briefs were due. Josh was acting erratically, telling
12 Chalese she could not leave and then knocking the TV over. Chalese got the children
13 out of the house and called the police. Josh was arrested and Chalese obtained a
14 TPO against him. Since that time Josh has provided a clean drug test to this writer
15 and he provided a letter from his treating physician to this writer and the criminal
16 court indicating that his medication was in the process of being modified and that he
17 was compliant with treatment. The charges against Josh were dropped and the TPO
18 was allowed to expire.
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21 Currently the state of Chalese and Josh's relationship is uncertain. Chalese
22 has certain decisions to make and, in the meantime, she has abided by this Court's
23 order of April 14, 2022. Josh has not been allowed around Michael and Marie during
24 her custodial time.
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27 Of course Josh's antics are like Christmas in April for Adam and suddenly
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1 there are CPS reports being filed, threats being made to this writer, accusations of
2 perjury and misleading the Court are being hurled, and Adam has filed yet another
3 motion. The CPS investigation was concluded and unsubstantiated, just like the
4 other ones.
5

6 The bottom line is that this is a Court and we have laws to follow. Chalese is
7 a caring, attentive, fit parent who clearly loves her children very dearly. There has
8 never been a substantiated claim of neglect or abuse against her. In fact, the expert
9 testimony in this case has established her as a very mothering personality type, as
10 evidenced by her career selection to work with children, first as a nanny before
11 Michael and Marie were born and now as a stylist in a children's salon.
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13 As the Nevada Supreme Court noted in *Davis v. Ewalefo*, 352 P.3d 1139, 1144
14 (Nev. 2015), the US Supreme Court ruled in *Troxel v. Granville*, 530 U.S. 57 (2000)
15 that "[T]here is a presumption that fit parents act in the best interests of their
16 children."
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18 Applying that standard to the present case, we have a parent (Chalese) who
19 has acted to protect her children. During the incident with Josh, she got them out of
20 the house, called the police, and obtained a TPO. On the flip side, we have Adam
21 who willfully excludes Chalese from even participating in her children's lives. He
22 unilaterally selects medical providers and schools and advises her of his decisions
23 after the fact. He has attempted to substitute his girlfriend for Chalese. Jessica is
24 not a fit parent because, in the constructs of this case, she is NOT a parent. She is a
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1 stepparent. Her decisions and actions with regard to Michael and Marie are not due
2 deference by this Court or anyone else because she is not their parent and she is not
3 a party.
4

5 As this brief is submitted, the future of Chalese's relationship with Josh
6 remains to be seen. Chalese has decisions to make, but she has demonstrated that
7 regardless of what the future holds, she is going to act in her children's best interest.
8 There is no reason to believe that she will do anything else. Chalese requests that
9 this Court lift the temporary restriction on Josh having contact with the children.
10 The criminal charges were dropped, the TPO expired, and Josh is compliant with his
11 doctors. Chalese and Josh have a daughter, Cheyenne, that they parent together.
12 They also own their home together. Regardless of whether they reconcile or choose
13 to part ways, Chalese is a fit parent and she is lawfully entitled to deference regarding
14 her parenting decisions.
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19 **ALIMONY/SPOUSAL SUPPORT**

20 Spousal support in this case has been a muddled issue, largely predicated on
21 Adam's constant filings and the repeated modifications of the temporary order that
22 was previously granted.
23

24 What is worth noting is the issue of health insurance. During the pendency
25 of this case Adam has been subject to the Joint Preliminary Injunction (JPI), just
26 like any other family law litigant. When Adam switched his job to the AG's
27 office, he took Chalese off of his health insurance and did not switch her to his new
28

1 employer provided insurance. His argument in Court was that he offered for her to
2 keep her insurance if she paid for COBRA. Such a suggestion is nonsense. There
3 is no way that Chalese could ever afford COBRA and Adam knew it.
4

5 As Adam has constantly and repeatedly reminded us during these
6 proceedings, he is not just a litigant, but he is also a licensed attorney. He is more
7 than capable of reading the JPI and he knew exactly what he was doing. He
8 intentionally and willfully violated the JPI that was issued in this case and deprived
9 Chalese of court-ordered health insurance in the process.
10

11 There is no way to provide an accounting of what Adam's violations of the
12 JPI cost Chalese, but it did cost her. Adam had a legal obligation to not only abide
13 by the JPI, but to also support Chalese. Whether he likes it or not, one of the
14 results of his protracted and vexatious litigation is that he has dragged out the time
15 he has remained married to Chalese. The couple just recently passed their ten-year
16 anniversary, and it is plainly Adam's fault. By remaining married to her, Adam
17 remained legally obligated to support her and he violated that obligation as well as
18 the JPI by cancelling her health insurance.
19

20 Adam also lowered his earnings when he took the job with the AG's office.
21 His income went from \$125,000 per year to less than \$85,000. He has since
22 received raises to lift his income just above \$90,000. In past filings he claimed that
23 the move also saved him approximately \$14,000 in health insurance costs, but that
24 took him from \$85,000 to \$99,000 and leaves over \$25,000 unaccounted for.
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1 Adam is capable of earning significantly more than he currently earns. He is
2 willfully underemployed and, considering his actions with the health insurance, it
3 appears that this move was at least partially done to frustrate Chalese's claim for
4 alimony and support.
5

6 This is not a long-term marriage being only ten years; however, during the
7 course of their marriage, Adam received the support of Chalese while he graduated
8 from law school, studied for the bar exam, and developed his career. Chalese was
9 a stay-at-home mother who experienced significant pregnancy related health
10 issues. Even if the parties had wanted her to work, carrying their children was
11 such a toll on her health that for much of their marriage she was simply unable to
12 work. Staying at home with the children in their tender years saved the family
13 significant childcare expenses as well. Chalese should be granted some form of
14 alimony in recognition of her physical, emotional, and occupational sacrifices to
15 this marriage and their children and the loss of health insurance due to Adam's
16 violation of the JPI.
17
18
19
20

21 This *Closing Brief* is respectfully submitted for the Honorable Court's
22 consideration this 18th day of May, 2022.
23
24

25 /s/ Michancy M. Cramer
26 Michancy M. Cramer, Esq.
27 Nevada Bar Number: 11545
28 *Attorney for Defendant*

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Pursuant to NRC 5(b), I declare under penalty of perjury, under the law of the State of Nevada, that I served a true and correct copy of *Closing Brief*, on May 22, 2024, as follows:

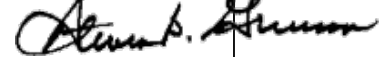
- [x] Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D), and Administrative Order 14-2 captioned “*In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court*,” by mandatory electronic service through the Eighth Judicial District Court’s electronic filing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

To the following address:

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

//s//Michancy M. Cramer

Alex Ghibaudo, P.C.
Attorneys for Defendant



EPAP

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

Eighth Judicial District Court
Family Division
Clark County, Nevada

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

**EX PARTE APPLICATION FOR AN ORDER SHORTENING
TIME ON PLAINTIFF'S MOTION TO RECONSIDER DECISION
AFTER DEFENDANT'S MOTION TO PLACE ON CALEDNAR
AND TAKE TESTIMONY**

NOW INTO COURT comes Plaintiff, ADAM MICHAEL
SOLINGER, and respectfully moves that, pursuant to EDCR 5.513, the
Court shorten time in which to hear Plaintiff's MOTION TO
RECONSIDER DECISION AFTER DEFENDANT'S MOTION TO PLACE
ON CALEDNAR AND TAKE TESTIMONY.

///

///

///

1 This application is made and based on all the papers and pleadings
2 on file herein and the declaration of counsel attached hereto. Attached as
3 an exhibit is the proposed order shortening time.

4 Dated Thursday, May 19, 2022.

5 Respectfully Submitted,

6 /s/ Adam M. Solinger

7 Adam M. Solinger
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1 **DECLARATION OF ADAM MICHAEL SOLINGER**

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

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

7 2. In essence, this motion to reconsider requests that this Court
8 continue a final decision and order in this case until such time as the
9 situation with Josh and Chalese becomes clearer and the CPS
10 investigation is completed and closed.

11 3. As more fully set forth in the underlying motion, additional
12 facts have come to light since the hearing.

13 4. Chiefly, the Defendant decided not to show up to the
14 preliminary hearing which resulted in the charges against Josh being
15 dismissed.

16 5. That same day, the Defendant felt it wise to send a message
17 to me letting me know that the TPO against Josh had been dropped.

18 6. Additionally, the CPS investigation revealed that another
19 concern had been reported by someone that Josh had started the car in
20 the garage with the Defendant and the children in the car in an attempt
21 to murder them and kill himself.

1 7. An order shortening time is necessary because what happens
2 with Josh now that he is not restrained by a TPO and the Defendant's
3 obvious desire to reunited with Josh can drastically impact the children
4 and it is nonsensical to rush to enter a final order given this mercurial
5 situation.

6 8. This Court denied a request to shorten time that was filed on
7 May 18, 2022 with the stated reason being that "the Court has been
8 informed that CPS has closed its case." However, Maxine Doggett, the
9 investigator assigned to the case confirmed that the case was still open
10 today, May 19, 2022 at 10:06 A.M. It's unclear where the Court received
11 this incorrect information from.

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

14 Dated this Thursday, May 19, 2022.

15
16 /s/ Adam M. Solinger
ADAM MICHAEL SOLINGER

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EXHIBIT A

1 **OST**

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

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

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

11 **ORDER SHORTENING TIME ON PLAINTIFF'S MOTION TO**
12 **RECONSIDER DECISION AFTER DEFENDANT'S MOTION TO**
13 **PLACE ON CALEDNAR AND TAKE TESTIMONY**

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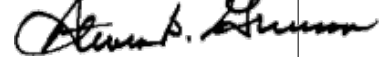
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1 Upon application of Plaintiff and good cause appearing therefore:
2 **IT IS HEREBY ORDERED** that the time for hearing on
3 **PLAINTIFF’S MOTION TO RECONSIDER DECISION AFTER**
4 **DEFENDANT’S MOTION TO PLACE ON CALEDNAR AND**
5 **TAKE TESTIMONY**
6 is hereby shortened and shall be heard on the ____ day of
7 _____, 2022 at the hour of _____ in Department P
8 (Courtroom #13)/(via Video Conference (Bluejeans)) of the Family Court,
9 located at 601 N. Pecos Rd., Las Vegas, NV 89101.
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15 Respectfully Submitted by:
16 Plaintiff

17 /s/ Adam M. Solinger
18 Adam Solinger
19
20
21



1 **OPPC**

2 Alex B. Ghibaud, Esq.

3 Nevada Bar Number: 10592

4 Michancy M. Cramer

5 Nevada Bar Number: 11545

6 **ALEX GHIBAUDO, PC**

7 197 E California Ave Suite 250

8 Las Vegas, Nevada 89104

9 T: (702) 462-5888

10 F: (702) 924-6553

11 E: alex@glawvegas.com

12 *Attorney for Defendant*

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

16 ADAM MICHAEL SOLINGER,

17 Plaintiff,

18 vs.

19 CHALESE MARIE SOLINGER,

20 Defendant.

Case Number: D-19-582245-D

Department P

21 **DEFENDANT'S OPPOSITION**

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

25 This *Opposition* is based upon the attached Memorandum of Points and
26 Authorities, any supporting exhibits provided in on file herein, any/all pleadings
27 and papers on file herein, and any further evidence or argument presented to the
28

1 Court at the hearing of this matter.

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

- 3 1. Enter an Order denying Plaintiff's Motion in its entirety;
4 2. Award Chalese any other relief this Court deems just and appropriate.
5

6 **DATED** this 24th day of May, 2022.

7 Respectfully Submitted,

8 *//s//Michancy M. Cramer*

9 **Michancy M. Cramer, Esq.**
10 *Attorney for Defendant*
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**
3 **FACTS**

4 Yet again we are in front of the Court on a frivolous motion by the Plaintiff,
5 ADAM SOLINGER (“Adam”). This case was initially filed in the beginning of
6 2019 and here we are almost half-way through 2022 and Adam is STILL trying to
7 litigate nonsensical and irrelevant arguments.
8

9 After the close of trial, but before the Court rendered its decision, there was
10 an incident in Defendant, CHALESE SOLINGER’s (“Chalese”) home. Chalese’s
11 partner, Josh Lloyd (“Josh”) was behaving badly and knocked a television off the
12 wall. The Court heard from Chalese that she had called the police, Josh had been
13 arrested, there was an active TPO in place, and there was a criminal no contact
14 order.
15

16
17 During the hearing Adam disclosed that there was a CPS investigation into
18 allegations along the lines of murder or violence from Josh and Michael (one of the
19 minor children) had asked for a knife. Chalese then disclosed through counsel that
20 she had contacted CPS already and that they had told her there appeared to be an
21 issue with Michael being coached. Those representations were presented to the
22 Court during the April 14, 2022 hearing in open court.
23
24

25 The Court concluded the hearing by directing the parties to submit their
26 closing briefs and issuing a temporary order that Chalese was not to have the
27 children around Josh. Chalese has followed that order.
28

1 Adam did not include his email, but rather quoted this writer's email response
2 to his email because he no doubt does not want the Court to see what he wrote.
3 (See Exhibit 1.) Adam, as usual, is threatening and blustering about things he does
4 not know and he is too arrogant to ask about.
5

6 Adam wrote this writer after the April 14, 2022 hearing and made
7 accusations that this writer had misled the Court and was lying. Implied in his
8 email was a threat against this writer. Whether that is a threat of a bar complaint or
9 a threat of sanction remains to be seen. The bottom line is that Adam's behavior is
10 out of line. He clearly does not know how CPS operates. Just because he spoke to
11 the investigator does not mean that Chalese did not call CPS or that a CPS worker
12 did not convey to her that it appeared that the children were being coached.
13
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15 As this Court is no doubt aware, CPS workers operate in teams. Typically,
16 there is an investigator and the supervisor. If a case is actually opened, the case
17 then transfers to a worker and a supervisor and a DA. If a worker or supervisor is
18 out of the office, someone on their team will assist on the case.
19
20

21 In this case Chalese was at work and got a notice that someone was at her
22 door through her ring camera. She looked and saw the person had a CPS logo and
23 since she obviously could not see the card they left at the door or who they were,
24 she just googled CPS from work and called the hotline number. After being
25 transferred several times to several different workers, she reached a worker who
26 was able to access the file. That is the person she spoke to. It was not the
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28

1 investigator on the case. As investigators are typically investigating in the field,
2 they are not frequently available in their office. Stating that Chalese spoke to a
3 CPS worker and that she had not spoken to the investigator are NOT mutually
4 exclusive events.
5

6 Adam has also included outrageous claims that Josh was trying to commit
7 mass murder and a bunch of hearsay claims regarding alleged statements from the
8 children. There was never an allegation that Josh was going to kill anyone. All he
9 did was tell Chalese she couldn't leave and then he knocked the television over and
10 acted like a fool. He was never charged with anything even remotely close to
11 murder or threatening murder. That simply NEVER happened. Josh was charged
12 with domestic violence, coercion, and resisting. All of those are typical charges in
13 a domestic violence case and they were dropped.
14

15 As far as the criminal case is concerned, Adam has no evidence to
16 substantiate his claim. In an entirely separate matter, this writer has represented a
17 family court litigant who did not want to testify against her spouse in a domestic
18 violence case and the District Attorney subpoenaed her and forced her to appear.
19 In this particular case, Chalese was given less than one (1) days' notice about
20 Josh's hearing by the DA's office and she was scheduled to work. She cannot
21 afford to miss work. If the DA wanted Chalese to appear and testify, the DA
22 would have subpoenaed her. Representations were made to this Court on April 14,
23 2022 that Josh was working with his medical providers in adjusting his
24 medications at the time of the incident and that Josh had been voluntarily drug
25
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1 tested at ATI and tested negative for narcotics. No doubt the DA was given the
2 same information by Josh's defense attorney.

3
4 Chalese messaging Adam does not constitute "gloating" as he claims. She
5 was merely informing him. If she had driven to his house and shouted "haha"
6 from the street, that might be considered gloating, but her statement as quoted by
7 Adam is not gloating. Adam characterizing her message as gloating is indicative
8 of Adam's view of the world though. He simply cannot tolerate the idea that he is
9 not going to get his way. It is beyond his comprehension that the world isn't
10 accepting his view and catering to his demands.
11
12

13 Chalese has not reunified with Josh. As the Court is aware, they have a
14 child together and do communicate frequently. They also own a house together.
15 As demonstrated by more than three (3) years of litigation, Adam no doubt cannot
16 relate to a couple that chooses to separate peacefully and maturely. If Chalese and
17 Josh choose to separate permanently, they have both vowed not to behave like
18 Adam. They have a child to raise together and this level of nonsense is certainly
19 not something either of them want to repeat.
20
21

22 Adam, being Adam, refuses to acknowledge that he really just does not
23 know what he is talking about. He cannot accept the possibility that things are not
24 exactly how he perceives them and he cannot help himself except to threaten and
25 harass everyone affiliated with this case, including Chalese's attorneys. His
26 behavior is out of line, his motion is frivolous, and he should be required to pay
27
28

1 Chalese's fees and costs associated with having to file this Opposition and
2 Countermotion.

3
4 **II.**
5 **LAW AND ANALYSIS**

6 The essence of Adam's motion is essentially that Chalese had not talked to
7 the investigator at CPS on April 14, 2022 and a bunch of self-serving hearsay
8 statements that indicate nothing more than a man who cannot accept the world is
9 not going to go his way.
10

11 There is not new evidence and there is not other evidence. The only thing
12 Adam has presented in his motion is proof he doesn't understand how CPS works
13 and some self-serving hearsay statements.
14

15 What is noteworthy is that Adam is, once again, accusing this Court of
16 having a bias. What is funny is that he accuses the Court of having a bias in favor
17 of joint physical custody. Pursuant to NRS Chapter 125C, the Legislature of
18 Nevada has stated that there is a *preference* for joint custody – both legal and
19 physical. After 3+ years of litigation, the summary of Adam's case in support of
20 him having primary physical custody amounts to the children having dirty
21 fingernails and a private investigator who could not even identify Chalese as the
22 driver of a truck he alleged was going more than 100 mph, though he admitted he
23 did not actually clock the speed of the truck because he lost sight of it on the
24 freeway. Adam failed to make his case and now is essentially accusing the Court
25 of bias for *following* the law. While a novel legal argument, it is without merit.
26
27

28 This Court did NOT make the findings regarding past motions or past orders

1 that Adam claims. His suggestion that it did is both a misstatement of the record
2 and a blatant show of disrespect to the Court. Adam is an attorney and subject to
3 the Nevada Rules of Civil Procedure. The Court does not require a motion to
4 make findings regarding his actions pursuant to NRCP Rule 11(c)(3).
5

6 Chalese should be awarded her fees and costs for having to oppose this
7 frivolous motion pursuant to NRS 18.010. Upon the Court's direction, a
8 memorandum of fees and costs with the appropriate *Brunzell* analysis can be
9 submitted.
10

11 **III.**
12 **CONCLUSION**

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

- 15 1. Enter an Order denying Plaintiff's Motion in its entirety;
16 2. Award Chalese any other relief this Court deems just and appropriate.
17

18 **DATED** this 24th day of May, 2022.

19 Respectfully Submitted,

20 *//s//Michancy M. Cramer*

21 **Michancy M. Cramer, Esq.**
22 *Attorney for Defendant*
23
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1 6. Josh's criminal case was dismissed. I was never subpoenaed by the
2 prosecutor to appear in the criminal court.

3
4 7. Since April 14, 2022, even though the TPO expired and the criminal no
5 contact order was dismissed, I have followed this Court's order and Josh has
6 not been around either Marie Solinger or Michael Solinger.

7
8 8. I did not gloat when Josh's case was dismissed. I merely informed Adam.
9 Since the TPO covered the children, I felt it was his right as their father to
10 know what the status of the order was.

11
12 9. Josh and I have not resolved where our relationship is going and, as I told
13 the Court on April 14, 2022, I do not want to be in another abusive
14 relationship. If Josh does what he needs to do, there is a chance we can
15 reconcile, but that is NOT set in stone.

16
17 10. Josh and I have a young daughter together and we own our house together.
18 We have resolved that whether we stay together or break up permanently,
19 we are not going to fight each other like Adam has fought with me. We will
20 do what is best for our daughter and at least be decent to each other.

21
22
23 **I declare under penalty of perjury under the laws of the State of Nevada**
24 **(NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and**
25 **correct.**

26 **DATED** this 24th day of May, 2022.

27 *//s//Chalese Solinger*

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CHALESE SOLINGER

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I declare under penalty of perjury, under the law of the State of Nevada, that I served a true and correct copy of *Defendant's Opposition*, on May 24, 2022, as follows:

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

To the following address:

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

//s//Michancy M. Cramer

Alex Ghibaud, P.C.
Attorneys for Defendant

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

Adam Solinger

Plaintiff/Petitioner

vs.

Chelese Solinger

Defendant/Respondent

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

**MOTION/OPPOSITION
FEE INFORMATION SHEET**

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

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

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

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

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

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

The total filing fee for the Motion/Opposition I am filing with this form is

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

Party filing Motion/Opposition: **Defendant**Date: **5-24-22**Signature of Party or Preparer: //s//Michancy M. Cramer

Exhibit 1

Michancy Cramer

From: Adam S <attorneyadamsolinger@gmail.com>
Sent: Thursday, April 14, 2022 1:17 PM
To: Michancy Cramer
Cc: Alex Ghibaudo; Charles Goodwin
Subject: Re: Solinger v. Solinger - Your Client's Misrepresentation

I'm unimpressed with your willingness to take your client's word at face value and just recklessly shoot from the hip despite the requirement for a reasonable inquiry.

On Thu, Apr 14, 2022 at 12:56 PM Michancy Cramer <michancy@glawvegas.com> wrote:

Adam,

I represented to the court what my client represented to me. I made it very clear to the court that my representations were an offer of proof and my motion offered to put my client on the stand so that the court could take testimony under oath if it had seen fit to do so.

I realize that you have little to no experience with CPS and it is clear to me that you don't know what you are talking about; nor do you understand how CPS operates.

I am neither impressed nor intimidated by your threats. Do what you need to do.

M

From: Adam S <attorneyadamsolinger@gmail.com>
Sent: Thursday, April 14, 2022 12:32 PM
To: Michancy Cramer <michancy@glawvegas.com>; Alex Ghibaudo <alex@glawvegas.com>; Charles Goodwin <charles@goodwinlawgroup.net>
Subject: Solinger v. Solinger - Your Client's Misrepresentation

You affirmatively misrepresented to the Court that your client had been in contact with CPS after accusing me of making misrepresentations. It's unclear whether your client is responsible for the misrepresentation or whether you are at fault.

I spoke directly to the CPS investigator involved at 12:04 PM today and she confirmed she was the only investigator assigned to the case. She said that she had been to your client's house twice with no answer and that none of her calls had been returned.

Ironically, after my conversation with her, she called me back at 12:09 PM and informed me that your client had finally called her back and is scheduled to meet with her on Monday.

Yet, the way you portrayed things in Court was fabricated wholesale. Who was it that said Michael's story was too consistent? Because there's only one investigator involved and she sure hasn't spoken to your client until now and she obviously has not spoken to Michael because she scheduled to visit him on Monday.

There's no family law exception to the rules of ethics. I'm asking that you file a notice with the Court correcting the affirmative misrepresentations.

--

Adam M. Solinger

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

Adam Michael Solinger,)	Case No.: D-19-582245-D
Plaintiff,)	Dept. P
-vs.-)	
)	Date EHT: multiple
Chalese Marie Solinger,)	Time: 9:30 am
Defendant.)	

This matter having come before the Court upon the scheduled Evidentiary Hearing held on May 10, 2021, January 21, 2022, March 1, 2022, March 2, 2022, March 3, 2022; held in person; and the Plaintiff appeared personally, self-represented; and the Defendant appeared personally, being represented by Michancy Cramer, Esq.; and the Court having read and reviewed all the papers and pleadings on file, heard and considered any testimony, exhibits and any prior rulings in this matter, and good cause appearing therefore, makes the following Findings of Fact, Conclusions of Law and Decree and Orders.

2. The minor children have resided in Nevada at all times relevant herein, including a period more than 6 months preceding the filing of this action, and Nevada is the Home State of the minor children, and pursuant to NRS 125A et. seq. this Court has initial, exclusive and continuing jurisdiction to make custodial determinations.

1 3. Plaintiff is and has been a bona-fide resident of Clark County, Nevada for
2 the requisite six weeks prior to filing for divorce, and has continued to reside in Clark
3 County ever since.

4 4. That the issues of custody (NRS 125C.0035(4))- the sole consideration is
5 the best interests of the children; child support and other financial issues are to be
6 adjudicated by the Court.

7 5. That there are separate and/or community property and/or debts to be
8 adjudicated by the Court (NRS 125.150)

9 6. That there is the issue of attorney's fees to be adjudicated by the Court.

10 ***Personal:***

11 4. The parties were married May 12, 2012 in Las Vegas, Clark County,
12 Nevada.

13 5. That the parties are the biological parents of two (2) minor child, to
14 wit: Michael Adam Solinger (dob 6/16/15-currently just shy of age 7) and Marie
15 Leona Solinger (dob 8/28/17- currently age 4).

16 ***Pleadings:***

17 6. Plaintiff (hereinafter referred to as "Plaintiff ", "Adam" or "Father")
18 filed the Complaint for Divorce on January 4, 2019 (Doc. 1), with claims regarding
19 custody, child support, other child related issues, community property and/or debts
20 to be adjudicated, separate property.

21 7. That the Summons and Complaint were personally served on the
22 Defendant on January 7, 2019, per the Affidavit of Service (Doc. 5).

23 8. Plaintiff filed Default (1/29/19 - Doc. 7).

24 9. Defendant (hereinafter referred to as "Defendant", "Chalese" or
25 "Mother") filed an Answer and Counterclaim (2/4/19 - Doc. 12) and an Amended
26 Answer and Counterclaim (2/7/19 - Doc. 15).

1 10. Defendant filed a Motion to Set Aside Default (2/7/19 - Doc. 16;
2 Amended Motion Doc. 18).

3 11. The Court finds that as the parties moved forward it was presumed
4 that the Default was set aside to hear the matter on its merits, but not reduced to
5 writing in the Order following the motion hearing (3/19/19 -Doc. 47).

6 12. That in her Amended Counterclaim (2/7/19 - Doc. 15), Defendant
7 with claims for custody, child support, other child related issues, community
8 property and/or debts to be adjudicated, separate property, alimony/spousal
9 support, attorney's fees, and requested that she be permitted to return to the use of
10 her former name to wit: Chalese Marie Anderson, or maintain her present name, at
11 her sole discretion.

12 ***Procedural History:***

13 13. This matter was originally assigned to the Hon. Judge Cheryl Moss
14 (Dept. I-Retired), and after the 2020 elections, was reassigned to Dept. U -
15 challenged by Plaintiff and was reassigned Dept. P., on January 12, 2021.

16 ***Dept. I Matters:***

17 14. That this Court finds that a complete review of the case file has been
18 necessary to understand and/or determine why the prior orders in this matter had been
19 made.

20 15. While both parties filed numerous motions in this matter, almost all of
21 Adam's motions were filed requesting to take more and more time away from
22 Chalese.

23 (a) At the initial hearing (3/19/19) the parties were awarded Joint Legal and
24 Joint Physical Custody with a 4-3/3-4 timeshare;

25 (b) 6/17/19 hearing- Adam's Emergency Motion for Change of Custody
26 (Doc. 49) - Adam's CPS inclusion regarding a chipped tooth was unsubstantiated;
27 prior judge orders random testing of Chalese over minimal marijuana use (extremely
28 low level in urine and nothing in hair); Adam unilaterally withholding the children;

1 Adam then brings up Chalese's prescription for Xanax to use as needed for diagnosed
2 anxiety and insisted on random drug test that includes Xanax; Adam and/or his agent
3 (private investigator) following Chalese basically 24/7, including a GPS monitor as
4 well as trespassing at her residence to take photos of the backyard; Chalese's attorney
5 seeks to cancel this as it creates anxiety; Adam brings up Chalese's boyfriend's
6 (Josh) custody case motions to use in this case, which the prior judge gets herself
7 involved in, which this Court finds inappropriate; due to Josh driving the children to
8 drinking a beer, prior judge shortens Chalese's custody to Adam having Primary
9 Physical Custody with right of first refusal with Chalese's timeshare shortened to 2
10 days per week; prior judge stating that "I'm shortening her time to send a
11 message...".

12 (c) 10/3/19 hearing - Motion to Continue Trial (Doc. 87); Plaintiff, who is an
13 attorney, tried to refer a case to the prior judge in her gambling court in front of
14 Defendant. Prior judge had to leave the courtroom due to how inappropriate it was.
15 This occurred while the attorneys were in the hallway off record. Further, there was
16 discussion regarding the Plaintiff threatening the District Court with a Writ.

17 (d) 12/6/19 - hearing on Chalese's Motion re Spousal Support, Attorney's
18 Fees (Doc. 130). For the first time it was pointed out to the Court regarding
19 Plaintiff's live in girlfriend, Jessica, and the issues of the Plaintiff having the children
20 look to Jessica as their mother. This issue will be discussed further in these Findings
21 at the appropriate time. (Continued to 12/9/19)

22 (e) 12/9/19 - Adam's Motion for Custody Evaluation was granted and was
23 to include Plaintiff's girlfriend. Chalese's counsel pointed out to the Court that:
24 "Custody is not an appropriate method to punish a parent you have to look at the best
25 interest of the children. So she violates a court order you sanction her, give her
26 warnings, but custody is not to be used as a sword that case law is clear." The Court
27 orders Defendant preliminary attorney's fees,
28

1 (f) 2/26/20 hearing- Adam's Motion to Reconsider (Doc. 232); Chalese's
2 Countermotion to Restore Joint Physical Custody (Doc.239) Adam argues that a
3 Custody Evaluation will show that now Chalese suffers from mental illness and that
4 the timing was a way to "resuscitate her case". The issue of the Court using custody
5 time to punish Chalese; and that the income of a non-spouse should be considered so
6 he could avoid paying his spousal support. Chalese argues that she has complied with
7 all of the Court's requests; the prior judge ignored Chalese's argument and still only
8 relief upon Josh (boyfriend) prior alleged acts to not provide Chalese her legal rights.
9

10 (g) 4/6-13/20 hearing- Adam's Motion for Change of Custody based upon
11 Emergency Circumstances (Doc. 286); Chalese's Opposition and countermotion
12 (Doc. 295), which included Adam's interrogation of children as to what goes on at
13 Chalese's home; the prior judge solely used the issues of Josh to maintain the status
14 quo.

15 *Dept. P Matters (1/12/21 forward):*

16 (1) 2/18/21 hearing - Adam's Motion to Terminate Spousal Support (Doc.
17 392); Chalese's Opposition and Countermotion (Doc. 394); Court modified spousal
18 support and set trial dates.

19 (2) 3/18/21 hearing on Adam's Motion to Modify Physical Custody
20 Pending Trial (Doc. 404); Chalese's Opposition and Countermotion (Doc. 408);
21 Modify Custody denied, Attorneys Fees deferred to trial.

22 (3) 4/30/21- hearing on Chalese's Motion for Witness to Appear Virtually
23 (Doc 410); Adam's Opposition (Doc 418) and Adam's Motion in Limine (Doc. 412);
24 Chalese's Opposition (Doc. 414); Dr. Paglini and rebuttal witness allowed to appear
25 via BlueJeans application; Dr.Paglini is the parties witness and not the Courts.

26 (4) *Trial- Day 1:* 5/10/21: The Court heard testimony of Dr. John Paglini.
27
28

1 (5) Plaintiff filed a Motion to Disqualify Judge (5/13/21 - Doc. 427);
2 Defendant filed Opposition (5/14/21 - Doc. 428); Judge filed Response (5/24/21-
3 Doc. 429); Chief Judge Linda Bell heard the Motion on the pleadings; Decision &
4 Order (6/24/21 - Doc. 444) denying the Motion to Disqualify.

5 (6) 7/8/21- hearing on Chalese's Motion Regarding Summer Custodial
6 Time (Doc. 433); Adam's Opposition (Doc. 440); Based upon Adam's allegations of
7 marijuana use, Court modified the custodial timeshare and time, as well as Chalese's
8 phone calls with children; all other issues deferred to trial.

9 (7) 9/17/21 - Trial - Day 2 -continued as Defendant's Counsel was ill. Was
10 also the scheduled hearing on Adam's Motion re Intent to Withhold Children (Doc
11 458); Chalese's Opposition and Countermotion (Doc 461) and Errata (Doc. 462);
12 Adam's Motion for Sanctions (Doc. 448) Motions continued to 9/27/21.

13 (8) 9/27/21 hearing: trial dates reset- issues re Covid resolved. Spousal
14 Support to end as of November 1, 2021.

15 (9) 1/22/22 Trial - Day 2- the Court heard testimony of Dr. Paglini,
16 Investigator Curtis Doyal; the Court, made temporary orders pending finalization of
17 trial: Joint Legal Custody, Joint Physical Custody, week on/week off schedule
18 exchange on Wednesdays, third party pickup permitted, vacation time only in the
19 summer; no right of first refusal, no withholding of children. Set trial date for Day 3.

20 (10) 3/1/22 - Trial Day 3 - Court heard testimony of William Donahue,
21 Joshua Lloyd and Jessica Sellers. All exhibits admitted with the exception of Adam's
22 video exhibits which were not admitted.

23 (11) 3/2/22 - Trial Day 4 - Court heard testimony of Jessica Sellers, the
24 Plaintiff and Defendant.
25
26
27
28

1 (12) 3/3/22 - Trial Day 5 - Court heard remainder of Defendant's
2 testimony. Ordered closing argument briefs by March 17, 2022; set return date for
3 Decision for April 14, 2022¹.
4

5 (13) Chalese filed Motion to Place Back on Calendar for further Testimony
6 (Doc. 494) set on Order Shortening Time to April 14, 2022, regarding incident
7 between Chalese and Josh. No formal Opposition was filed by the Plaintiff. Motion
8 was discussed but the Court did not reopen trial for new testimony. The Court moved
9 the decision date forward to 5/26/22. Plaintiff sought to cautiously inquire of the
10 Court on the amount of time had been taken regarding the issuance of the Final
11 Decree.
12

13 ***SPECIFIC FINDINGS -- WITNESSES***

14 ***Dr. John Paglini:***

15 The Court ordered a Custody Evaluation, and Dr. Paglini was agreed to by
16 the parties to provide same.

17 At the outset Dr. Paglini should have disclosed when he was retained that
18 Adam referred a criminal case to Dr. Paglini, as it could create a conflict, which was
19 not disclosed until later.

20 In his testimony at trial, Dr. Paglini stated that though Chalese had mild
21 issues with stress related decision making, there was nothing that concerned him. He
22 saw no psychosis so the elevated scores did not cause him concern, and stated that
23 Chalese being in a high stress situation and with the problems with her pregnancy that
24 she would react in a different way than normal. He was more concerned over dog
25 feces in the backyard.
26
27

28 ¹ Judge Perry contracted Covid-19 and thereafter acute pancreatitis and pneumonia, including hospitalization, between March 8 and April 9, 2022.

1 One of the issues the Court specifically wanted explored and so stated at the
2 hearing when the evaluation was ordered, which was not explored by Dr. Paglini was
3 that of “gate keeping”.

4 This court finds that on certain subjects Dr. Paglini was degrading of
5 Chalese’s personal situation, basically centered on her financial situation, or lack
6 thereof, while at the same time praising how wonderful Adam’s father was in
7 providing Adam with access to funds, as well as purchasing him a new home.

8 What became clear from Dr. Paglini’s report and testimony, is that he
9 focused on Chalese, and not much at all regarding Adam other than lack of proper
10 pool security. The court finds it troubling that Adam had to have someone point out
11 to him the dangers of the unfenced pool with small children around; yet, nevertheless,
12 Adam believes that he can dictate other people’s living habits in their own residence.

13 This Court finds that Dr. Paglini failed to fully follow what the Court
14 ordered. Dr. Paglini seemed to solely focus on Chalese, and not the parties equally,
15 as if he only performed the equivalent of a brief focus assessment on Chalese, as
16 Adam had requested of the court, but was denied in favor of the full custody
17 evaluation of both parties as was ordered.

18 Ultimately, upon review, the Court finds Dr. Paglini’s report is incomplete,
19 and while the Court may agree with certain aspects of the report and the testimony
20 that dovetail with other testimony, the Court simply cannot accept same it in its
21 entirety as completely credible.

22
23 ***Dr. William O’Donohue (Defendant Rebuttal Expert):***

24 Dr. O’Donohue’s credentials are extensive and so is his work in the area
25 of custody, evaluations, both preparing and being a rebuttal witness. He has
26 testified as an expert a minimum of 200 times, and about a dozen as a rebuttal
27 witness. That the Court finds and holds that Dr. O’Donohue is qualified to testify
28 as an expert witness.

1 His testimony was based upon those facts that were placed in Dr.
2 Paglini's report. His testimony was based only upon a review of what had
3 occurred which was contained in Dr. Paglini's report, yet the Court finds his
4 testimony enlightening.

5 Dr. O'Donohue testified that after listing multiple factors to be looked at
6 in Dr. Paglini's report, he added his own factors as well as part of his testimony.

7 Dr. O'Donohue questioned Dr. Paglini's methodology in arriving at the
8 various statements, failed to cover various subjects, and the like in Dr. Paglini's
9 report. One example is Adam simply going into Chalese's residence without
10 permission. Dr. Paglini did not explore how this could have affected Chalese, or
11 consider Adam's motivation and the need to break into the other parent's home.
12 Another is Chalese being in the hospital during hard labor for one of the children
13 of the parties, and Adam was not there, but was out riding his bike and studying for
14 the bar. Adam showed lack of displaying any priority as to child care and concern
15 for his wife was noted.

16 Another would be Dr. Paglini's lack of any observation of emotional
17 maturity; yet Dr. Paglini made a determination of Josh's emotional maturity and
18 finances without ever speaking with Josh. There were other items of mere
19 statement but without any exploration by Dr. Paglini (night-time medication; only
20 Chalese's violation of Court orders with no mention of Adam's).

21 Dr. O'Donohue testified that Dr. Paglini's report is full of mere
22 statements, without exploring the validity of such statements. In various
23 circumstances, Dr. Paglini only reported Adam's side of various issues, and clearly
24 accepted Adam's interpretation of matters, including downplaying Adam's own
25 drug use, but failed to explore further as to mom's issues regarding each subject.
26
27
28

1 That Dr. Paglini did not fully investigate as to the various stressors that
2 having a private investigator follow her would have on Chalese, who already had
3 an anxiety and PTSD issues; that pressuring her could create Chalese's
4 unwillingness to deal with Adam.

5 Dr. O'Donohue did take notice of Chalese's working with children, her
6 being a child's Hairstylist and nanny shows an affinity to children and being with
7 them, and commented: "Skilled as primary care giver, show affinity toward it, and
8 liking it, shows best interest to the children". Dr. O'Donohue also noted that pre-
9 separation, Chalese was a stay-at-home mother and primary caregiver of the
10 children.

11 The Court finds this a reasonable questioning of Dr. Paglini's report since
12 many things were never addressed (noted above). Chalese was in the hospital
13 during hard labor for one of the children of the parties, and Adam was not there,
14 but was out riding his bike and studying for the bar. There was a lack of
15 displaying priority as to child care and concern for his wife. No exploring of this,
16 but just a statement. No conclusions, yet it shows Dad's interests other than
17 family.

18 Ultimately, the Court finds that Dr. O'Donohue's testimony and report to
19 be very credible and useful and lends further credence to the Court's findings
20 regarding Dr. Paglini's report/testimony.
21

22 ***Investigator Curtis Doyal:***

23 Mr. Doyal was hired by Adam to surveil Chalese. He testified that he did
24 not recognize anyone in the courtroom, even though Chalese was in the courtroom.

25 The predominant occasion surrounding his report/testimony that Chalese
26 drove recklessly. Testimony included the fact that it was very dark when he did
27 the surveillance. That he saw a GMC pick-up truck and female drive up in that
28 truck and went inside then came out with a child; that he lost sight of the initial

1 GMC, that he himself drove 90 miles an hour or more in attempting to catch the
2 person in the truck, as he had no specified equipment to properly note how fast his
3 subjects were traveling, and could not even be sure it was the same vehicle.

4 The Court finds that there is no showing by any sort of evidentiary value
5 that this was, in fact, Chalese.

6 The Court finds that there was no evidentiary value to Mr. Doyle's
7 testimony and cannot to be relied upon.

8
9 ***Joshua Lloyd (Defendant's significant other):***

10 Mr. Lloyd, while having difficulties with when something occurred,
11 definitely remembered what occurred, in detail. The Court finds that there is
12 blame to go around to all of the interconnected parties on this particular issue.

13 Overall, the Court does find Mr. Lloyd to be credible, as to those events in
14 this matter, after he became comfortable and expanded his answers.

15 The court finds that there was no reason that Josh could not be a
16 babysitter. He had joint custody of his own children.

17
18 ***Jessica Sellers (Plaintiff's significant other):***

19 The major issue with Jessica Sellers, is that she believes, together with the
20 Plaintiff, with their testimony, that she is a better mother. They both testified as to
21 Jessica's parenting abilities versus Chalese's, which is troublesome and cause for
22 some concern. They both testified that Chalese could never be replaced but actions
23 speak louder than words.

24 One example of Jessica's intentional interference is when Jessica picked
25 up the children on exchange day at about 1:30 pm, knowing that Chalese would be
26 picking them up after she got out of work, solely because Jessica promised
27 swimming time to the children. She did not return the children to the day care prior
28 to Chalese arriving to pick them up, causing further turmoil.

1 Jessica is not credible when she says she does not want take the place of
2 Chalese, even though she stated she picks up the children, goes to the parent
3 teacher conference, doctor's appointments, child exchanges, and that she is the
4 better mother. Her excuse was that if Chalese did then she wouldn't need to. The
5 Court believes that if Jessica did not seek to usurp her place, Chalese would be
6 comfortable going, as she was previously used to doing.

7 Jessica was the proximate cause of the driveway incident. Despite the fact
8 that she had a Justice Court TPO against Josh and ordered that Josh was to remain
9 inside the residence during child exchange, she chose to violate her own TPO by
10 arriving at Josh's home, and parking across his driveway, creating the incident,
11 knowing that Chalese/Josh and the children were not home but on their way, and
12 required the driveway. Adam could have picked up the children to avoid this type
13 of issue or Jessica parking across the street to avoid being on Josh's residential
14 property.

15 What is clear is the Adam's intent to systematically demean Chalese on
16 many levels, as a parent.

17 The Court finds that Ms. Sellers' (and the Plaintiff) attitude, testimony
18 and/or opinion of their intent to undercut Chalese with Jessica in this regard is
19 completely reprehensible.

20
21 ***Adam Solinger (Plaintiff):***

22 Adam Solinger is an attorney, and as such, when it came to following the
23 law/rules, etc., there was a higher expectation from him as a self-represented
24 individual in this matter (after January 2021).

25 Throughout this case, both pre and post Dept. P assignment, he conducted
26 himself with some of the worse type of behavior the Court has seen to date, in the
27 deliberate manner he treated the mother of his children, in deliberately seeking to
28 actually demean and/or undercut her altogether.

1 His legal strategic approach leaves much to be desired and created
2 unnecessary and unwarranted litigation.

3 Mr. Solinger, over the course of this case, has been the proximate cause of
4 various issues that this Court was required to deal with.

5 These issues include but are not limited to:

6 (a) Admits that hiring a PI to follow Chalese around or to place a tracking
7 device on her vehicle to see if she was adhering to orders; this is not consistent
8 with co-parenting.

9 (b) Does not believe that it is abusive behavior to have strange men
10 following Mom around in grocery stores, parking lots, chasing her in the streets or
11 even her home. (Trial Video 3/2/22 timestamp 2:00 to 2:10)

12 (c) Dad violated joint legal custodial provisions and picked, without
13 consulting Chalese, schools, day cares, speech therapy, cutting daughter's hair
14 (even though Chalese is a child hairdresser), etc. He tried to mislead by saying he
15 consulted with Chalese then stating that CCSD chooses the school children go to.

16 (d) That Adam exercised vacation time, usually reserved for the
17 summer, in between Thanksgiving and Christmas 2020 and 2021, leaving Chalese
18 with only two days of visitation with the children over the holidays, all due to the
19 Christianity dinners on Sundays during this period of time. All of a sudden, Dad
20 recognizes Christianity practices when he was always an atheist. The Court does
21 not find Adam credible when he testified that he was not looking to "take time
22 away from Chalese", but rather to celebrate Christian "dinners" with his girlfriend.

23 (e) The Court finds that Adam lacks candor to the Court in situations
24 when it benefits him not to do so.

25 (f) The Court does not find the Plaintiff credible on many issues as to his
26 intent. Ultimately with a combination of testimony, Adam's and Jessica's actions
27 speak louder than words.
28

1 ***Micro Managing***

2 THE COURT HEREBY FINDS:

3 That after vacating the community residence, and moving in with his
4 girlfriend, Adam, without Chalese's knowledge and/or consent, entered Chalese's
5 residence, taking video and still photos of the residence, causing heightened
6 anxiety for Chalese. Chalese has also seen him sitting outside of her home when
7 she saw the videos on the Ring doorbell video. There is also Adam's admitting to
8 placaiing a tracking device on Chalese's vehicle. The court finds Chalese credible
9 on these issues. Once Adam moved out, he should not have entered the residence
10 without Chalese's knowledge and consent or an absolute emergency.

11 That Adam trying to force Chalese to take the children to preschool or a
12 particular day care on Mom's time is an attempt to micromanage Chalese and her
13 ability to parent on her own time.

14 Adam attempted to take Chalese's boyfriend's deposition twice, against
15 Nevada's rules, rather than only once.

16 Adam complained about Chalese picking the children up early from
17 daycare, from which she was going to pick them up from daycare anyway as it was
18 her time commencing when school let out, and she could pick them up at any time
19 after that. This is another example of Adam's micro-managing.

20 Though agreeing to phone calls at 7 pm, calls did not take place. The
21 Court finds Chalese's testimony more credible that she did try to call the children,
22 but Adam would not answer the phone versus Adam's testimony that she never
23 called.

24 That Adam mentioned in his Motion to change custody filed March 31,
25 2020 that he told Chalese that she needed to bathe the children every day to ensure
26 the children are as clean as possible. He also ordered Chalese that the children had
27 to be in bed by a certain time during her custodial timeshare. These are further
28 examples of Adam's micro-managing.

1 That in the same motion, Adam complained that he did not know the
2 social distancing protocols of Chalese's chosen babysitter, when Chalese had an
3 appointment she could not cancel. The Court finds that whomever Chalese would
4 have left the children with, Adam would have complained about that as well.

5 Adam objected to when Chalese brought her boyfriend into the picture,
6 yet he had a girlfriend.

7 These attempts to micro-manage Chalese and the children, clearly shows
8 Adam's inability or unwillingness to co-parent and that there is no pleasing him.
9 No matter what happens, Adam will always take an adverse position to Chalese's
10 choices, even during a pandemic.

11 Adam complained that Chalese has chickens at her house, which could
12 spread Covid.

13 During the pandemic, Adam complained that Josh and his children went
14 grocery shopping. Like everyone else in Las Vegas during the pandemic, going
15 grocery shopping, was and is, a necessity. This Court finds this complaint from
16 Adam was frivolous and without merit.

17 That there have been no reports that Chalese has allowed Josh to be alone
18 with the children or has allowed him to drive with the children, since 2020, and
19 there was no evidence presented at trial. Chalese testified that she left one of the
20 children with Josh in the middle of the night, as she had to take a trip the
21 emergency room

22 The Court does not find that Adam is credible when he testified that he
23 did not take time away from Chalese to celebrate "Christian" dinners with his
24 girlfriend. It should be noted that both parties testified, that neither of them were
25 religious per se, or celebrated holidays as a religious time as such. Adam testified
26 that he is an atheist.

At the beginning of COVID Pandemic, Adam withheld the children because of his “I know better than you” attitude on more than one occasion. Adam withheld all but 24 hours in April 2020, and even had the audacity to request Chalese clean her home daily to his specifications and that he be permitted to randomly inspect same, which the Court finds is overstepping the boundaries, and intolerable.

* * * * *

Further, despite being an attorney, and having a legal researcher (girlfriend) to assist him for most of this case, Adam violated the Joint Preliminary Injunction when he decided to take mom off of health insurance when he changed jobs, even though no one gave him permission to do so.

The major issues the Court has with the Plaintiff is the controlling nature, micro management that he shown, as well as the complete disrespect he has for the mother of his children, blatantly inserting his current girlfriend into the “mother’s role.

As an attorney, Adam’s use and portrayal of an excuse of “ignorance” of the Family Court law, rules, etc. on multiple occasions is disingenuous. A pro per litigant cannot avoid proper application of the law on grounds that he lacked knowledge of procedural rules. See Rodriguez v. Fiesta Palms, LLC, 134 Nev. 654, 659, 428 P.3d 255, 259 (2018) (noting that a "litigant cannot use his alleged ignorance as a shield to protect him from the consequences of failing to comply with basic procedural requirements"); Sengel v. IGT, 116 Nev. 565, 572, 2 P.3d 258, 262 (2000) (recognizing that the public has constructive knowledge of state law).

The Court finds that Adam engaged in bad faith and unreasonable conduct that “permeated the entirety of the litigation”. Adam’s behavior and actions taken in this matter can be categorized as misconduct so egregious that it raises concerns over integrity and fundamental fairness.

1 ***Chalese M. Solinger (Defendant):***

2 That until this matter commenced, Chalese was the primary caregiver
3 with all issues surrounding the children. Once this matter commenced, Chalese did
4 not participate in the son's speech therapy, parent-teacher conferences, etc.
5 Chalese was the primary caregiver and even Adam's testimony was that being the
6 care giver was her role in the marriage. However, much of Chalese's
7 responsiveness more than likely was stemming from Adam's controlling attitude
8 and his insistence on having it his way only, including his insistence that his
9 girlfriend, Jessica, be included in everything. Chalese's minimal income prohibits
10 her ability to be involved during her work hours.

11 Chalese testified regarding the issue with Michael's birth, how difficult it
12 was and how Adam could not be bothered. Apparently, Chalese and the children,
13 when Michael was a newborn had to leave the home and go to Idaho for 1 ½ years
14 because Adam had to deal with his studies.

15 Chalese testified as to Adam and Jessica's constant repeat of Marie
16 having diaper rash, but they never brought her to a doctor. Chalese took her to the
17 doctor and it turned out to be a yeast infection.

18 The Court finds that Chalese is credible in that she does work with Minor
19 child at home practicing his speech therapy with a mirror.

20 The Court finds that Chalese did not take vacation time for two years
21 because she could not afford to take the time off from work.

22 The Court finds that there was no testimony as there being any issues with
23 the medication that Chalese was prescribed to take, and finds that there was no
24 testimony that Chalese was abusing these medications.

25 The Court finds that Chalese's "paranoia" was justified in the way Adam,
26 Jessica, and private investigators seemed to be always following her.

1 The Court finds Chalese credible in her rendition of what happened at the
2 day care when Jessica decided to take the children home to go swimming, so close
3 to Chalese's time share that Jessica did not return the children until Chalese had
4 already arrived. Once school let out, it was on Chalese's timeshare, whether she
5 picked the children up literally when school let out, or sometime during the school
6 after-care program.

7 Overall, the Court finds Chalese to be very credible, including but not
8 limited to her PTSD and anxiety, medication usage, and the like, as well as her
9 testimony as to all of the issues that went on during this litigation.
10

11 ***SPECIFIC FINDINGS - OVERALL***

12 THE COURT HEREBY FINDS:

13 The Court Finds that the way Chalese was treated by the prior Court was
14 abhorrent. Without so much as an offer of proof she has been accused of doing
15 multiple things which were absolutely legal to do. There were multiple allegations
16 predominately against the boyfriend, Josh, and not against Chalese herself, for
17 which the prior judge on various occasions reduced Chalese's custody. *It was*
18 *argued at the time, that the prior Court, more than once,* reduced Chalese's
19 custodial timeshare and/or actual time as a punishment, and this Court agrees. This
20 Court considers the prior Court's so using custody as a punishment are improper,
21 even to "get Chalese's attention". *Sims v. Sims*, 109 Nev. 1146, 1149, 865 P.2d
22 328, 330 (1993), *Wiese v. Granata*, 110 Nev. 1410, 1412, 887 P.2d 744, 746 (1994)
23 (quoting *Dagher v. Dagher*, 103 Nev. 26, 28 n.3, 731 P.2d 1329, 1330 n.3 (1987))
24 "A court may not use changes of custody as a sword to punish parental
25 misconduct."
26

27 The Court Finds that but for the above actions by the prior judge
28 affirming Adam's actions (either directly or indirectly), Chalese would be awarded
primary physical custody.

1 Further, the Court also Finds that Adam's behavior in having Chalese
2 followed, a tracker on her car, the game-playing, and ultimately the false
3 allegations and actions taken "minimize" Chalese, despite all the prior years of his
4 working long hours leaving the children in Chalese's sole care, was proof that
5 Chalese was a great mother, until he chose to replace his wife with another woman.
6 His actions speak volumes.

7
8 In this matter Adam has had an issue with the Court disagreeing with his
9 point of view. This is shown on multiple hearings, one of which was after the
10 Court awarded spousal support. While it is true that the Court can consider a
11 remarried party's new spouse's income under *Rodgers v. Rodgers*, 110 Nev. 1370,
12 887 P.2d 269 (Nev., 1994): "Although the narrow statutory definition of gross
13 monthly income does not encompass community income, an examination of a
14 remarried parent's "relative income" may properly include consideration of his or
15 her one half interest in the new spouse's income. This theory does not necessarily
16 hold true when litigants are not remarried. Adam wanted the Court to rely on the
17 boyfriend's income, but not to do the same with Plaintiff and his live in girlfriend.

18 Further, after day 1 of trial, with other days pending, Adam apparently
19 believed that the undersigned would not give him what he wanted, and sought to
20 disqualify the undersigned by way of his Motion to Disqualify, which was
21 ultimately denied.

22 A recurring theme in this case is Adam's perceived superiority over
23 Mother when it comes to parenting. During the parties' marriage, Chalese
24 provided nearly all of the child-rearing duties, supporting Adam so he could
25 establish his career as an attorney, etc.

26 The Court finds that during this time period, Adam was working 60 +
27 hours a week and leaving the children with mom. He had no problems with
28 Chalese's ability to care for the children then, it is only after he has moved on that
he now has problems with mom's ability to parent.

1 The Court finds that Chalese from birth to the date of the commencement
2 of this action was the sole/primary custodian and caregiver of the children, and that
3 demeaning her abilities as a parent are unjustifiable.

4 Conversely, Adam preferred to perform virtually no parenting during the
5 parties' marriage, and has admitted that was the "division of labor" as defined by
6 him; this Court defines as Chalese does all the work with the children, as it pertains
7 to school, doctors, etc., and Adam does nothing in this regard and was happy to
8 delegate the responsibility. Adam started making negative allegations about
9 Chalese's parenting, all for the purpose to again displace Chalese, and provide him
10 with the majority of custodial timeshare, and then have Jessica, who already
11 appears at functions such as parent-teacher meetings and the like in Adam's place.

12 In fact, at trial Jessica admitted on the stand that she is a better mother
13 than Chalese. This avenue of thinking first appeared in this matter in December
14 2019 hearing.

15 Adam has shown that he believes that his opinions as to Chalese's
16 "horrible judgment and reckless behavior" are true because Adam says they are
17 true, none of which he was able to prove at trial. Adam did not attend a single
18 speech therapy session with Michael prior to the separation. Adam refused to pay
19 support to Chalese absent a Court order and insisted she get a job, and now accuses
20 her of "refusing" to take Michael to speech therapy because she cannot get Michael
21 across town with her work schedule and be able to take time off.

22 In this matter, we have both parties violating Court orders; but Adam's
23 withholding the children from Chalese provides further impetus as to Adam's true
24 motives - simply to undercut Chalese and cut her out of children's lives. The prior
25 Judge did get Chalese's attention. Since that hearing, Chalese changed counsel,
26 took the UNLV parenting class, took the COPE class, but he made it impossible
27 for her to deal with him.
28

1 Adam conducted himself in this divorce matter, which started out as a
2 routine type matter, by way of scorched earth litigation. One definition of
3 “scorched earth litigation” is conduct whose goal is to wear down the other side,
4 create excessive amounts of work, and act relentless. This definition applies to
5 Adam throughout this case. He persistently adopted a “war mentality”, to “push the
6 envelope”, without much thought, if any, to economics or good faith.
7

8 Early on in this litigation, Adam used allegations about Chalese (abusing
9 drugs), which turned out not to be true, in an attempt to withhold access, actually
10 withholding access, and in some of those occurrences stated it was his “vacation
11 time”.

12 The Court finds that Adam believes he should be able to use CPS as his
13 personal “go to” to investigate what he considers issues to be investigated.

14 Adam’s continued bad faith and unreasonable conduct permeated the
15 entirety of the litigation.

16 **FACTORS PURSUANT TO NRS 125C.0025**

17 NRS 125C.0025 states that: When a court is making a determination
18 regarding physical custody of children, there is a preference that joint physical
19 custody would be in the best interest of a minor child. The Sole consideration is the
20 best interest of the child. The minimum factors a court must consider is spelled out in
21 NRS 125C.0035(4) as follows:

22 (a) *Wishes of the child if of sufficient age and capacity to inform an intelligent*
23 *preference.* This factor is neutral since neither child is of sufficient age and capacity
24 to form an intelligent preference.

25 (b) *Nomination by parent/guardian.* This factor is neutral due to there being no
26 nomination by a parent or guardian.
27
28

1 (c) Which more likely to allow frequent associations and continuing associations
2 and continuing relationship with other parent.

3 This case has been fraught with Adam's attempts to cut Chalese out of the
4 children's lives, and replace her with his girlfriend. He would take vacation time
5 during weekends throughout December, which was Chalese's regular timeshare,
6 where she would end up having only have a couple of days during the month of
7 December. Adam withheld the children from Chalese in April 2020 to the point
8 where Chalese only received 24 hours with the children during that month. This
9 occurred again at Christmas time (2020 and 2021).

10 Dr. Paglini stated that Chalese started counseling in order to deal with
11 Adam.

12 Given that Adam continually filed motions which sought to reduce
13 Chalese's timeshare, all based upon Adam's opinion of how Chalese should be
14 parenting the children (see also micro managing herein).

15 When Chalese sought to switch days so the children could attend their
16 cousin's birthday party, Adam refused to cooperate. This indicates Adam's inability
17 and/or unwillingness to co-parent with Chalese.

18 Adam's attitude needs to change as the parties move into the future, and
19 must actually co-parent with Chalese. For now, this factor favors Chalese.

20
21 (d) Level of Conflict between parents

22 This is a very high conflict case. The court believes that both parents' have
23 some fault to a degree, but moreso Adam with his constantly seeking to micro-
24 manage Chalese's life, her residence, her boyfriend, etc., keeping her passive, as
25 such passivity is simply easier on Chalese due to her anxiety disorder, as testified by
26 both Dr. Paglini and Dr. O'Donohue.

1 (e) *Ability of parents to cooperate to meet the needs of the child.*

2
3 As noted above, Adam tends to be extremely micro-managing of the
4 children and their lives, to the point where he sought to have Chalese follow his
5 orders when he demanded that he set bathing schedule and bedtimes for the
6 children at Chalese's home, handed down a cleaning schedule for Chalese to
7 follow in her home and the like.

8 Adam made sole decisions regarding the children as to school, medical
9 issues and the like, without discussing same with Chalese, and only telling her later
10 on.

11 Chalese is credible in her explanation of Marie's teeth issue for a
12 procedure to rectify a problem before it became a necessity, and Adam not wanting
13 to spend the money at that time as the procedure was not necessary at that moment,
14 but within a couple of weeks it became necessary, and unfortunately Marie had to
15 deal with a lack of her two front teeth much sooner than usual.

16 On the other hand, it is understandable that Chalese has backed off
17 matters with Jessica's appearance into the scene, and the treatment she has
18 received from Adam and Jessica and Chalese being pushed away.

19 Adam's attitude in all respects is that he is superior to Chalese as a parent,
20 that her wishes and ideas should not be considered, and that it is "his way or the
21 highway." Such attitudes demonstrate that Adam has impeded the parties' ability
22 to cooperate to meet the children's needs.

23 For now, this renders this factor favors Chalese.

24 (f) *Mental and physical health of parents*

25 There was no evidence of either party having uncontrollable mental health
26 issues. Chalese has depression and anxiety, and she has stated she suffers from
27 PTSD. Adam has had Chalese followed to the point where it made her feel like
28 she was being followed everywhere. Adam sought to make it appear that mom
was being paranoid. This was not paranoia. This was Adam seeking to instigate

1 an issue to make Chalese look bad. The intensity of the stressors of this divorce
2 surely have triggered Chalese's anxiety.

3 Dr. Paglini noted that he believes that Adam has Mild Narcissistic
4 tendencies, and a problem with control issues, and this Court agrees.

5 This Court believes that Chalese's passiveness with Adam's controlling
6 history or narcissistic personality could be a reason for her to more likely
7 disengage with Adam.

8 This factor is neutral but slightly favors Adam.

9 *(g) Physical, developmental, emotional needs of child*

10 Up until January 2019, Chalese was involved with the children and their
11 health appointments, school, etc. Chalese was the primary care taker and had a
12 difficult pregnancy (not Plaintiff's child) during this case and was on bed rest so
13 being able to participate became difficult. The parties' son has a speech impediment,
14 but no other physical, developmental and/or emotional needs. Both parties know
15 what needs to be done, leaving this factor as neutral.

16 *(h) Nature of relationship of child with each parent*

17 There was No testimony that showed the children have anything but a
18 good loving relationship with each parent. This factor is Neutral.

19 *(i) Ability of the child(ren) to maintain a relationship with siblings.*

20 Adam has no other children. Chalese has another child, and the subject
21 children have the right to their relationship with their sibling. Any minimization of
22 Chalese's time interferes with this relationship and is not in the children's best
23 interests. This factor favors Chalese.

24 *(j) History of abuse or neglect.*

25 There was no testimony regarding abuse or neglect of the children. Even
26 though Jessica tried to claim it was neglect for the children to have dirty
27 fingernails, this does not rise to neglect. This factor is neutral.

1 (k) *Engaged in act of DV against child, parent or any other*
2 *person residing with the child.*

3 Adam's use of the children in an attempt to control Chalese is borderline
4 domestic abuse and/or violence. This is one of the reasons why it is a rebuttable
5 presumption that perpetrators of domestic violence should not have primary
6 physical or joint physical custody of minor children.

7 Adam's stalking Chalese through private investigators sitting across from
8 her home, Jessica sitting in her vehicle across from Chalese's home, Adam's
9 invading Chalese's home after he moved out could also be deemed domestic abuse
10 and/or violence.

11 This factor favors Chalese.

12 (l) *Engage in act of abduction.*

13 This has not been raised as an issue, therefore this factor is neutral.

14 (m) *Other.*

15 Prior to the testimony of Mr. O'Donohue, The Court had various
16 impressions regarding Dr. Paglini's report due to the lack of exploring very important
17 facts: Adam's withholding the children, taking his vacation time just on Chalese's
18 weekends to keep Chalese from seeing the children for long periods of time. Adam's
19 use of drugs, Adam's actions bordering domestic abuse and/or violence, Adam's
20 entering Chalese's home uninvited. Mr. O'Donohue testimony mirrors the Court's
21 thoughts that Dr. Paglini overall appeared biased in favor of Adam and against
22 Chalese.

23 As to these factors and it appearing that Chalese receiving the majority of
24 the factors, Chalese should be awarded primary physical custody; however, it is
25 unfortunate that the prior judge, whether intentionally or overtly, enabled and/or
26 endorsed these actions causing these stunts to continue.

The Court finds that Adam has repeatedly expressed hostility and animus towards Chalese, making derogatory comments that he was generally combative and unwilling to co-parent or confer with Chalese in any effective manner. The Court is concerned that Adam's denigration of Chalese affects the relationship in front of the child.

At the present time, this Court is willing to provide Adam the opportunity to show he can properly co-parent without the behavior he has already shown.

Post-Trial Motion

That after the final day of trial in this matter, Chalese and her boyfriend, Josh, became involved in an incident/ argument which proceeded to, inter alia, Josh breaking the television. Josh was arrested at that time and charged with domestic violence. The Court finds that Chalese acted properly and appropriately in removing the children and calling the police.

* * * * *

That should any Finding be more properly construed as a Conclusions of Law, the same shall be so construed.

CONCLUSIONS OF LAW

1. That the Court has jurisdiction pursuant to NRS 125.020, 125.120, 125.130, and to make orders as to the parties' legal status;

2. That the Court has the authority to make orders as it pertains to the marital estate, separate and/or community property/debts (NRS 125.150);

3. Legal custody involves having basic legal responsibility for a child and making major decisions regarding the child, including the child's health, education, and religious upbringing. *Rivero v. Rivero*, 125 Nev. 420-421, 216 P.3d 213, 221 (2009) (citing, *Mack v. Ashlock*, 112 Nev. 1062, 1067, 921 P.2d 1258, 1262 (1996)). Joint legal custody requires that the parents be able to cooperate, communicate, and compromise to act in the best interest of the child. *Id.* (citing, *Mosely v. Figliuzzi*, 113 Nev. 51, 60-61, 930 P.2d 1110, 1116 (1997)). In a joint legal custody situation, the

1 parents must consult with each other to make major decisions regarding the child's
2 upbringing, while the parent with whom the child is residing at that time usually
3 makes minor day-to-day decisions. *Id.* (citing, *Mack*, 112 Nev. at 1076, 921 P.2d at
4 1262).

5 4. That the Court has the authority to make orders as it pertains to Custody
6 (NRS 125C, et.seq., *Rivero -v- Rivero*, 216, P.3d 213 (2009); 125 Nev. Adv. Op.
7 No. 34 (August 27, 2009), *Wallace v. Wallace*, 112 Nev. 1015, 1019, 922 P.2d 541,
8 543 (1996) ("Matters of custody and support of minor children rest in the sound
9 discretion of the trial court"); *Bluestein v. Bluestein*, 131 Nev., Adv. Op. 14, 345 P.3d
10 1044, 1048 (2015) reiterating that "in custody matters, the child's best interest is
11 paramount");

12 5. When making a custody determination, the sole consideration is the
13 best interests of the child. NRS 125C.0035(1); *Davis v. Ewalefo*, 131 Nev. 445, 451,
14 352 P.3d 1139, 1143 (2015). Moreover, the district court's order "must tie the child's
15 best interest, as informed by specific, relevant findings respecting the [best interest
16 factors¹ and any other relevant factors, to the custody determination made." *Davis*,
17 131 Nev. at 451, 352 P.3d at 1143.

18 6. That the Court has the authority to make orders as it pertains to Child
19 Support (NAC Chapter 425; NRS 125B et.seq., *Barbagallo v. Barbagallo*, 105 Nev.
20 546, 779 P.2d 532 (1989)), *Wright v Osburne*, 114 Nev. 1367, 970 P.2d 1071,
21 (1998);

22 7. When one party complains of an error that that party caused, the invited
23 error doctrine bars appellate relief. *Pearson v. Pearson*, 110 Nev. 293, 297, 871 P.2d
24 343, 345 (1994). This doctrine applies to both "affirmative conduct and a "failure to
25 act to prevent the error. *Id.* (internal quotations omitted). When Adam commenced
26 his wrongful behavior by what appears to be his surveillance, accusations of drug
27 and/or alcohol abuse, his claim she has mental health issues, combined with at the
28 time, Chalese's pregnancy and other issues, he created the very issues he brought

1 forth to the Court in order to obtain his own agenda. In the end after all of his
2 bullying tactics, the only real (but misguided) statement he could make is that the
3 children had dirty fingernails.

4 * * * * *

5 That should any Conclusions of Law be more properly construed as a
6 Finding, the same shall be so construed.

7 **DECREE & ORDERS**

8 *NOW THEREFORE*, and good cause appearing; It Is Hereby
9

10 ORDERED, ADJUDGED and DECREED that this Court has personal
11 and subject matter jurisdiction over the parties and the marital estate. The parties
12 are incompatible in marriage, thus the bonds of matrimony now existing between
13 the parties are wholly dissolved, and an absolute Decree of Divorce is hereby
14 granted to the parties, and each of the parties is hereby returned to the status of a
15 single, unmarried person. NRS 125.020 and NRS 125.120. This is a final and
16 absolute Decree of Divorce, wholly and completely dissolving the marriage and
17 dividing the assets and liabilities of the parties. NRS 125.130; and it is further
18

19 ORDERED that the Plaintiff has requested a name change, and she may
20 resume the use of her prior surname of Chalese Anderson, or any other surname
21 she has legally used at her sole discretion; and it is further

22 ORDERED that as this marriage was a short term marriage, and as both
23 parties are in good physical condition, have the ability to work, and as temporary
24 spousal support was ordered during the pendency of this matter, neither party is
25 entitled to receive alimony/spousal support from the other; and it is further

26 **PERMANENT BEHAVIORAL ORDER**

27 ORDERED as set forth in this Behavior Order, the use of the pronoun
28 “You” applies to BOTH the Plaintiff and the Defendant in this matter. Specifically,
the parties are hereby ORDERED to comply with the following:

1
2 1. You shall not engage in any abusive contact (foul language,
3 name calling, etc.) with the other party or children, including telephone
4 calls, letters, e-mail, etc.

5 2. You shall avoid any unnecessary contact with the other party's
6 family, friends, associates, neighbors, co-workers, "significant other",
7 etc., and you shall not initiate conflicts with them.

8 3. You shall maintain respect toward the other party's friends,
9 relatives, "significant other", etc.

10 4. You shall not contact any persons associated with the other party
11 (including but not limited to: "significant others", friends, relatives,
12 neighbors, employers, co-workers, business associates, and customers) for
13 purposes of discussing court proceedings or making negative/disparaging
14 allegations about the other party (this includes all forms of social media).

15 5. You will advise all your friends, relatives, and "significant
16 others" if they express an intent or otherwise disparage, criticize, or harass
17 the other party, that such behavior is disallowed, and that you could have
18 your parenting time limited if you are unable to stop their negative
19 behavior, and that you may be sanctioned if the Court finds that you
20 knowingly allowed them, and/or did not take sufficient effort to prevent,
21 them to violate the terms and intent of this Behavior Order.

22 6. Pursuant to EDCR 5.304 (eff. 6/11/22, formerly 5.301), you will
23 **NOT**, nor shall anyone on your behalf, communicate, discuss, or provide
24 any information concerning court issues or proceedings with the minor
25 children; this includes audio and video thereto, and will take every
26 precaution to secure copies of pleadings safely away from the eyes of the
27 children at all times (including evidence or documentation from your side
28 or the opposing party's side), unless authorized by the Court.

7. You shall focus on your children and keep in mind what is in the
children's best interest.

8. You shall not, either directly or through third parties, including
significant others, inappropriately question or interrogate your children
about what occurs in the other parent's household, etc., and shall try to
respect and not interfere with the children's privacy and relationship with
the other parent; do not place your children in a loyalty bind between
yourself and the other parent; your children need to be able to love both of
you freely in both of your homes for healthy child development.

1
2 9. You shall not provide, either directly or through third parties,
3 copies of any unsolicited documents (personal letters, court pleadings,
4 etc.) to anyone associated with a party (family members, neighbors,
5 employers, etc.) for the intended purpose of casting the other party in a
6 negative light.

7 10. There shall be no harassment at the other party's place(s) of
8 employment, including contacting the employer to make negative or
9 disparaging allegations, to send or drop off evidence as it relates to these
10 court proceedings that appears reasonably designed to put them, or likely
11 to put them, in a bad light or to get them fired, or to have them suffer
12 negative consequences as a result.

13 11. Neither party shall post, nor shall you allow significant others
14 or family members on social media to post, including, but not limited to,
15 Facebook, Twitter, YouTube, Instagram, LinkedIn, Tumblr, and Google+,
16 or any other social media platform, any negative or disparaging allegation
17 against or negative image of the other party or anyone associated with the
18 other party.

19 12. Neither party shall interfere with the other party's contact with
20 the minor children, including but not limited to telephone calls, e-mail,
21 social networking, etc.

22 13. Neither party shall threaten to commit, or actually commit an
23 act of violence upon the other party or upon the minor children, or upon
24 the significant other, friend, relative, employer, employee, neighbor, etc.
25 of a party.

26 14. All child custody exchanges, visitations, etc., shall be done in a
27 civil, law-abiding manner and reasonably close to the times specified by
28 the Court. In the event of an emergency or unforeseen circumstance that
could affect an exchange of the children or the time of the exchange, the
party experiencing the difficulty shall call or contact the other party via
text messaging as soon as reasonably possible.

15 15. There shall be no invasion of the electronic devices, email
16 accounts, social media accounts, separate bank accounts, safe deposit
17 boxes, separate residences or separate vehicles, etc. of the other party.

18 16. That Plaintiff's current and/or future significant other shall not
19 perform any duties rightfully belonging to the Defendant, including but
20 not limited to meetings/events at school, doctor's appointments and the

1 like. The two parents shall be listed at all schools as such, and they come
2 before all others as emergency contacts.

3 17. Both parties are under a continuing obligation to provide to the
4 other party any change in their cell phone numbers and/or e-mail address
5 within forty-eight (48) hours of any change.

6 18. Both parties are to ensure that the other parent receive the
7 proper parental respect i.e. children do not call their parents by their first
8 name.

9 19. This Behavior Order shall remain in full force and effect unless
and until otherwise ordered by this Court.

10 *Contempt and Possible Sanctions:* The parties are HEREBY PUT ON NOTICE
11 THAT EACH AND EVERY VIOLATION of this Behavioral Order, if admitted
12 to, or if found after evidentiary hearing to have committed an act that violates this
13 Order, may result in the party being held in contempt of court pursuant to NRS
14 Chapter 22, which could result in a fine of \$500, 25 days in jail, and/or attorney's
15 fees for EACH VIOLATION (e.g., 4 separate violations could be 100 days in jail
16 and/or \$2,000.00 in sanctions); it is further

17 THE PARTIES ARE HEREBY PUT ON NOTICE that if it is found by
18 the Court, that if, in the future, one of the parents provides false information in an
19 effort to sway the Court's decision in their favor, or slanders the opposing party in
20 an untrue manner without significant evidence, that party may be sanctioned by the
21 Court. The consequences may include requiring the party who knowingly made
22 false statements or provided false evidence to pay for the other parent's Court costs
23 and legal fees; additional fines and automatic removal of falsified document;
24 modification of the decision making and physical custody in the other parent's
25 favor; make-up visitation time; and may also include a referral to the appropriate
26 authority as it relates to any potential criminal matter. If the Court determines that
27 a party has unjustifiably denied or interfered with visitation granted by an order,
28 the Court may take certain additional remedial measures to provide make-up time
or to ensure future compliance; and it is further

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COMMUNICATION

ORDERED that all primary communications between the parties, except for emergencies affecting the children, shall be by Our Family Wizard program, for which any and all fees for use shall be borne by Adam (for both parties). ALL COMMUNICATION is to be polite, respectful, business like regarding child issues only, without swearing, criticizing, disparaging the other parent, or telling the other parent how to parent, or how to conduct their household. If an emergency arises regarding the minor children, Parties may contact the other Parent directly; and it is further

ORDERED that Each parent shall respond to postings on OurFamilyWizard (Talking Parents or other texting app, collectively called "OurFamilyWizard") within 24 hours of posting. If a parent fails to respond to a posting on OurFamilyWizard within 24 hours, that parent's lack of response is deemed consent and approval to the information posted (i.e., vacation dates, medical appointments etc.). If a parent is going to be unavailable to check OurFamilyWizard for a period of time, the unavailable parent must post dates of unavailability to OurFamilyWizard at the beginning or prior to the period of unavailability. If a parent is unavailable for purposes of communications via OurFamilyWizard, the unavailable parent shall respond to the other parent within 24 hours of his/her becoming available/ the end of the notified period of unavailability; and it is further

ORDERED that Each party shall file proof that he activated an account with OurFamilyWizard within three (3) days of issuance of this Order; and it is further

ORDERED that Each parent shall keep their password to their OurFamilyWizard account private and shall not share their password or login information with anyone else except their attorney if needed for litigation. Neither

1 party shall permit any third party to communicate through his/her
2 OurFamilyWizard account on his/her behalf.
3

4 **CHILD CUSTODY**

5 ORDERED that the Court believes the it is in the best interests of the
6 children, despite the trial testimony, factors and the within findings of the Court,
7 herein that the parties are awarded **Joint Legal Custody** over the two minor
8 children, to wit: Michael Adam Solinger (dob 6/16/15-currently age 6³/₄), and
9 Marie Leona Solinger (dob 8/28/17- currently age 5¹/₂).
10

11 *Joint Legal Custody Orders:*

12 1. That each party shall consult and cooperate with the other in substantial
13 questions relating to religious upbringing, educational programs, significant changes
14 in social environment, and healthcare of the child(ren).

15 2. That each party shall have access to healthcare and school records pertaining
16 to the child(ren) and be permitted to independently consult with any and all
17 professionals involved with the child(ren).

18 3. That all schools, healthcare providers, and regular daycare providers for the
19 child(ren) shall be selected jointly by the parties. Each party is to ensure that the other
20 party has full contact information of any and all providers. In the case of healthcare
21 providers, both parties are to ensure that the healthcare providers have copies of all
22 health insurance information.

23 4. That each party shall be empowered to obtain emergency healthcare for the
24 child(ren) without the consent of the other party. Healthcare includes treatment for
25 mental health, therapy and counseling. Each party shall notify the other party as soon
26 as reasonably possible of any illness requiring medical attention, or any emergency
27 involving the child(ren). Neither party may obtain non-emergency healthcare for the
28 children without advance notice to the other party of the time and date of the
appointment so that the other party may attend.

5. That each party shall have access to any information concerning the well-
being of the child(ren), including, but not limited to, copies of report cards; school
meeting notices; vacation schedules; class programs; requests for conferences; results
of standardized or diagnostic tests; notices of activities involving the child(ren);
samples of school work; order forms for school pictures; all communications from
schools, healthcare providers, and regular daycare providers for the child(ren) to
include the names, addresses, and telephone numbers of all such schools, healthcare
providers, and regular daycare providers.

6. That each party shall advise the other party, if not communicated by the
event originator (school, athletic association, etc.), within 24 hours of receipt of any
such communication, of all school, athletic, church, and social events in which the
child(ren) participate(s), and each agrees to notify the other party within a reasonable
time after first learning of the future occurrence of any such event so as to allow the

1 other party to make arrangements to attend the event if he or she chooses to do so.
2 Both parties may participate with the child(ren) in all such events, including but not
3 limited to, attendance at school events, athletic events, church events, social events,
4 open house, school plays, graduation ceremonies, school carnivals, etc.

5 7. That each party shall be prohibited from enrolling the child(ren) in
6 extracurricular activities which infringes upon the other party's parenting time without
7 advance authorization from the other party.

8 8. That each party shall provide the other party with the address and telephone
9 number at which the minor child(ren) reside(s), and to notify the other party within
10 seven (7) days after any change of address and provide the telephone number if said
11 number changes.

12 9. That each party shall provide the other party with a travel itinerary to
13 include destination, departure and return times whenever the child(ren) will be away
14 from that party's home for a period of two (2) nights or more.

15 10. That the parties are to remember the they are both parents to the children,
16 and that neither party shall disparage the other in the presence of the child(ren), nor
17 shall either party make any comment of any kind that would demean the other party in
18 the eyes of the child(ren).

19 IT IS FURTHER ORDERED that specifically, as there has been during
20 the pendency of this matter by Plaintiff/Dad, there will be no unilateral decisions
21 on matters that are under the joint legal custody mandate (medical, school, etc.) in
22 the future. If the parties do not agree, then they will need to find an alternative
23 resolution to the issue or bring it before the court; and it is further

24 ORDERED that again, that the Court believes the it is in the best interests
25 of the children, despite the trial testimony, factors and the within findings of the
26 Court, herein the parties are awarded **Joint Physical Custody** of the minor
27 children, to wit: Michael Adam Solinger (dob 6/16/15-currently age 6³/₄), and
28 Marie Leona Solinger (dob 8/28/17- currently age 5¹/₂), and it is further

ORDERED, that in order to minimize parental contact, the parties shall
follow the week on week off timeshare schedule with the Minor Children, with the
exchanges taking place every Wednesday after school; with pickup allowed at after
school day care; if there is no school, at 6:00 pm, at the location which the parties
are currently using, or at some other designated location that the parties may agree,
should either party move or the existing location become inconvenient, any new

1 location is to be reasonably central to both parties. Should a third party, or non-
2 family member be meeting the other parent for child exchanges, then that parent is
3 responsible to communicate the name and telephone number to the other parent;
4 and it is further

5 ORDERED, that the receiving parent will provide transportation (pickup)
6 the children; and it is further

7 **HOLIDAYS**

8 ORDERED, that the parties shall utilize the following schedule as and for
9 Holiday time:

10 1. *Monday Holidays*: Martin Luther King Day (3'd Monday in January),
11 President's Day (3rd Monday in February) and the like. The parties shall keep the
12 regular weekly schedule, in that when a Monday holiday falls on their respective
13 time, that party will have the Monday holiday, with the following exceptions:

14 Memorial Day	Dad every year
15 Labor Day	Mom every year

16
17 2. *Other Holidays*. 4TH of July (when it falls), Nevada Day (last Friday in
18 October), Halloween, Veterans Day, etc. The parties shall keep the weekly
19 schedule, in that when a holiday falls on their respective time, that party will have
20 the holiday.

21 3. *Mother's Day (second Sunday in May), every year*: If the holiday falls
22 on Mother's usual weekly timeshare, there is no adjustment. If the holiday falls on
23 Father's weekly timeshare, then Mother is entitled to have the child from 9:00am
24 on the Saturday before Mother's Day, until drop off at school on Monday.

25 4. *Father's Day (third Sunday in June), every year*: If the holiday falls on
26 Father's usual weekly timeshare, there is no adjustment. If the holiday falls on
27 Mother's weekly timeshare, then Father is entitled to have the child from 9:00am
28 on the Saturday before Father's Day, until 9:00 pm (as there is no school).

1 5. *Children's birthday:* (Michael - June 16th, and Marie -August 28th)
2 Mom - odd years, Dad - even years. If the child's birthday falls on a parent's usual
3 weekly timeshare, there is no adjustment. If the holiday falls on the other parent's
4 weekly timeshare, then that parent is entitled to have the child from 9:00 pm the
5 evening prior (if no school) or after school if school is in session, until drop off at
6 school the next morning, or if no school, 9:00 pm that birthday evening. The
7 receiving parent will ensure that the children speak with the other parent for their
8 birthday.

9 6. *Parent's birthday, every year:* (Adam - July 1 and Chalese -
10 November 17th) If the parent's birthday falls on that parent's usual weekly
11 timeshare, there is no adjustment. If the parent's birthday falls on the other parent's
12 weekly timeshare, then the birthday parent is entitled to have the child from 9:00
13 am that day (if no school) or after school if school is in session, until that evening
14 at 9:00 pm.

15 7. *Spring Break or other school breaks - every year:* The parties shall
16 utilize the regular weekly schedule.

17 8. *Thanksgiving School Break:* Overall, the parties shall keep the usual
18 weekly schedule, with the exception for Thanksgiving Day as stated below.

19 9. *Thanksgiving Day:* Dad - even years, Mom odd years: If Thanksgiving
20 Break/Day falls during that parent's usual weekly timeshare, there is no adjustment.
21 If Thanksgiving Day falls on the other parent's weekly timeshare, then that parent
22 is entitled to have the Children from 6:00 pm on the Wednesday before
23 Thanksgiving Day until 9:00 am on the Friday immediately following
24 Thanksgiving Day.
25
26
27
28

1 10. *Christmas - New Years/Winter Break:* As neither parent has stated
2 they celebrate the traditional Christmas holiday, the Winter Break shall be divided
3 in half, with Mom having the first period every year- defined as from close of
4 school to the midway point, and Dad having the midway point to the day prior to
5 school resuming.

6 11. The parties are to understand that maintaining the weekly schedule as
7 it relates to some of the holidays may appear unequal in any given year, but that
8 over the course of time and the calendar, ultimately will equal out for both parties
9 and is in the minor child's best interests, as well as to limit the parents' contact,
10 since this is a high-conflict case.

11 12. *Vacations:* Given the weekly timeshare, each parent is entitled to take
12 the minor child on a vacation during their respective timeshare, without further
13 specialized times for vacations, so long as school is not interrupted.

14 Vacations shall otherwise be taken during the summer and/or when the
15 children do not have school.

16 Each parent is permitted one (1) separate seven (7) day period allotted as
17 vacation time (which would provide a one-time three weeks for vacation during the
18 summer). As such, if a parent indicates an extended vacation, which would
19 necessitate their utilizing their 7 day period during the other parent's regular time
20 during the summer, they must, in writing, notify the other parent no later than May
21 30th of that year, and provide an itinerary within 14 days prior to exercising said
22 time.

23 Under no circumstances is vacation time to be utilized to take the other
24 parent's regular weekly timeshare, when the children are in school or during a
25 "holiday" period.

26 Any use of the "vacation time" that is less than the seven (7) day period of
27 time shall be construed as using their entire seven (7) days.
28

1 If either parent is taking a vacation outside the State of Nevada, they are
2 to provide notice to the other parent of the trip, fourteen (14) days in advance for
3 vacations within the United States and thirty (30) days' notice in advance for any
4 vacations outside the United States, and provide an itinerary of said trip, which
5 includes but is not limited to: destination, departure and return dates/times, etc.
6 Each parent will ensure that the children are able to speak with the other parent
7 prior to departure and upon return home, and usual telephone calls are suspended
8 for the vacation period. Should a parent fail to notify or provide an itinerary within
9 the time period allotted, they will forfeit the vacation time.

10 Should an uncontrollable event (airline delay due to weather, and the like)
11 cause a delay in return the vacationing parent shall notify the other parent
12 immediately. Such a delay will not be held against either parent, and no
13 compensatory time is assumed or granted in such a situation, or for extenuating
14 circumstances, may allow for makeup time, or for extenuating circumstances, may
15 allow for makeup time.

16
17 *13. School Events:* School events which the minor child wishes to
18 participate, is the responsibility of each parent, on their custodial time, to ensure
19 the child's participation. Either/both parent(s) may participate and/or volunteer in a
20 school event.

21 *14. Educational:* Parent/teacher conferences may be scheduled by each
22 parent separately, if possible. While any and all communications should be sent to
23 both parents, should any communication(s) from school be sent to only one parent
24 (i.e. via email), same shall be forwarded to the other parent immediately. Any
25 situation at school (i.e. discipline event) may be attended by either or both parents.
26 Should the child be required to leave school, whether due to illness or discipline, if
27 the custodial parent, or designated alternate, is not reachable by the school, the
28 noncustodial parent may pick up the child, but deliver the child to the custodial
parent as soon as possible **that day**.

1 Under no circumstances may a parent delegate any conference (for
2 whatever reason) to a significant other. These conferences are for the parents only.

3 IT IS FURTHER ORDERED, that the parties may, on their allotted
4 weekly timeshare, take the minor child on a vacation, outing, visiting family, etc.,
5 which may or may not be outside the State of Nevada, without the other parent's
6 permission; but, the parties **shall** simply notify the other parent of the trip, and
7 contact information of where the children are to be in the case of emergency; and it
8 is further

9 ORDERED that it is in the best interests of the children, due to the high
10 conflict of the parties, that should the children desire to speak with the other
11 parent, the parties will encourage the minor children to do so. Each child shall
12 have unfettered access to the other parent to call the other parent at any time. Each
13 parent is entitled to two (2) parent initiated telephone calls with the minor children
14 during the other parent's timeshare, to be on Thursdays and Mondays at 7:00 pm.
15 The custodial parent shall make the children available at those times; and it is
16 further

17 ORDERED, that each parent is entitled to obtain daycare/babysitting
18 providers of their choice during their custodial timeshare and there shall be NO
19 Right of First Refusal; and it is further

20 ORDERED that various Miscellaneous Provisions are as follows:

21 1. Each parent to provide and maintain their own clothing, etc. for
22 the minor child in their respective homes;

23 2. Should the child be on medication for an illness, each parent
24 shall ensure that the other parent is provided with the medication at the
25 time of custodial exchange;

26 3. Each parent shall ensure that the other parent is provided with
27 the any extracurricular equipment the child may require at the time of
28 custodial exchange;

4. Each parent to provide daycare/babysitting as necessary on their
respective timeshare;

5. Neither parent may dictate whom the other parent utilizes for
daycare/babysitting, or directly or indirectly interfere in any manner;

1
2 6. Neither parent is to make demands or seek to dictate how the
3 other parent is to parent; however the parties are encouraged to discuss
4 and work together regarding important topics, forward important and
5 pertinent information (i.e. education, social, health concerns, etc.).

6 7. Each party shall ensure that both the child's biological parents
7 are to be included on the child's forms (school, medical, etc.) Each parent
8 may include other family members/relatives on any such forms, with all
9 such notations as to relationship clearly stated on forms.

10 8. Each party shall ensure that both the child's biological parents are
11 to be the only included individuals on the child's forms (school, medical,
12 etc.) Each parent may include other family members/relatives on any such
13 forms with all such notations as to relationship clearly stated on forms for
14 emergency/pickup use only if both parents cannot be reached.

15 IT IS FURTHER ORDERED that the Court reiterates its prior order that
16 the children should go to school every day and the school supplies that are needed
17 should, regardless of who purchased it, go with the child. Court further noted, the
18 clothes that are purchased belong to the child and that it is either party's duty to
19 return the clothes when the children goes with the other parent; and it is further

20 ORDERED that none of the shenanigans which occurred during the
21 pendency of this action (following Chalese, false accusations of drug use/abuse,
22 etc. or otherwise) should occur in the future, and are prohibited; and it is further

23 ORDERED that should any of the specific behavioral provisions,
24 additional custodial provisions in the Decree be violated that upon a motion
25 presented to the Court, it may be considered under the factors required for a
26 modification of custody; and it is further

27 **CHILD SUPPORT, TAX ALLOCATION & MEDICAL EXPENSES**

28 IT IS FURTHER ORDERED that child support is dictated by statute
and/or precedent, and pursuant to NRS Chapter 125 and/or NAC. As the parties
share joint physical custody, child support is set pursuant to the formula provided
in *Wright v Osburne*, 114 Nev. 1367, 970 P.2d 1071, (1998), and the amounts
determined by the percentages provided under NAC Chapter 425; and it is further

1 ORDERED that there are two (2) children for which child support applies
2 pursuant to the following formula pursuant to NAC 425.140:

3 2. For two children, the sum of:

4 (a) For the first \$6,000 of an obligor's monthly gross income, 22 percent of
5 such income;

6 (b) For any portion of an obligor's monthly gross income that is greater than
\$6,000 and equal to or less than \$10,000, 11 percent of such a portion; and

7 (c) For any portion of an obligor's monthly gross income that is greater than
\$10,000, 6 percent of such a portion.

8 IT IS FURTHER ORDERED that based upon either filed Financial
9 Disclosure Forms and/or the representations of the parties, both parties gross
10 monthly income (GMI) are as follows:

11 Plaintiff/Dad GMI = \$9,799

12 $6,000 \times 22\% = \$1,320.00$

13 $3,799 \times 11\% = \$417.89$

14 $\$1,737.89$

15 Defendant/Mom GMI = $\$2,377 \times 22\% = \523.14

16 $\$1,737.89 - \$523.14 = \$1,214.75$ (rounded to \$1,215.00)

17 Plaintiff /Dad is obligated to pay Defendant/Mom \$1,215.00 per month,
18 payable on or before the 1st of each month, commencing June 1, 2022; and it is
19 further

20 ORDERED that while there were various deferrals of various sums in this
21 action that became so overlapped, the Court orders that there are no arrears in child
22 support as of the date of this Decree as to either party; and it is further

23 ORDERED that pursuant to NAC 425.160(1), any award of Child
24 Support, except as otherwise provided by law, terminates when the child reaches
25 18 years of age or, if the child is still in high school, when the child graduates from
26 high school or reaches 19 years of age, whichever comes first; and it is further

27 ORDERED that the parties shall share the tax return deduction for the
28 minor children as follows:

1 Plaintiff/Dad shall receive the tax deduction for Michael Adam
2 Solinger in all tax years, commencing with tax year 2022;

3 Defendant/Mom shall receive the tax deduction for Marie Leona
4 Solinger in all tax years, commencing with tax year 2022;

5 ORDERED that Plaintiff/Dad shall obtain, pay for, and maintain health
6 insurance for the children without offset due to the disparity of income of the
7 parties; and it is further

8 ORDERED that any unreimbursed medical, dental, optical, orthodontic or
9 other health related expense incurred for the benefit of the minor child is to be
10 divided between the parties at the rate of 65% paid by the Plaintiff and 35% paid
11 by the Defendant due to the disparity in income, pursuant to the 30/30 Rule: either
12 party incurring an out of pocket medical expense for the child shall provide a copy
13 of the paid invoice/receipt to the other party within thirty days of incurring such
14 expense, if not tendered within the thirty day period, the Court may consider it as a
15 waiver of reimbursement. The other party will then have thirty days from receipt
16 within which to dispute the expense in writing or reimburse the incurring party for
17 one-half of the out of pocket expense, if not disputed or paid within the thirty day
18 period, the party may be subject to a finding of contempt and appropriate
19 sanctions; and it is further

20
21 **OTHER MISCELLANEOUS CHILD EXPENSES**

22 ORDERED that the parties shall follow the following provisions as it
23 pertains to any other child expenses:

24 1. Educational expenses include annual registration/enrollment fees,
25 divided Adam- 65% and Mom- 35%.

26 2. Annual school supplies - Father shall cover the annual cost for Michael
27 and Mother shall cover the annual cost for Marie. Once Michael ages out, the
28 parties shall split the costs for Marie.

1 3. School related expenses (field trips, lunches, etc.) will be divided
2 Adam- 65% and Mom- 35%.

3 4. School supplies that require specialized equipment which retail over
4 \$50 or more individually, shall be divided Adam- 65% and Mom- 35% between
5 the parties (or as otherwise agreed upon), upon proof of comparison shopping for
6 the most inexpensive cost for that item.

7 5. Extracurricular educational programs shall be discussed between the
8 parents, including costs and agreed upon in writing.

9 6. Extracurricular activities (sports, lessons, etc.) shall be discussed
10 between the parents, including costs. Each activity is a separate and distinct
11 activity, not to be incorporated or associated with other activities. Either parent
12 may enroll the child in an activity that exclusively falls on their timeshare at that
13 parent's cost. Should the activity, i.e. team sports with a game schedule, with fall
14 into both parents' timeshares, and the parties agree on the activity, then the cost
15 shall be divided Adam- 65% and Mom- 35%, and each parent will ensure the child
16 arrives for the activity on their timeshare. Activities shall not interfere with regards
17 to the other parent's availability unless agreed upon, and shall not cause any
18 financial hardship for a parent. Should the activity fall into both parents
19 timeshares, but one parent cannot afford to pay for the activity on their own
20 timeshare, the other parent may have the child attend the activity on only their own
21 timeshare at their cost. Each parent shall ensure that the child gets to his activity
22 during their timeshare in a but one parent cannot afford to pay for the activity on
23 their own timeshare, the other parent may have the child attend the activity on only
24 their own timeshare at their cost. Each parent shall ensure that the child gets to his
25 activity during their timeshare in a timely manner.

26 7. Discussions must respect consideration of the other parent's monetary
27 situation, and discussion of extra -curricular educational or activity programs is not
28 to be an assumed agreement.

1 **SEPARATE AND/OR COMMUNITY PROPERTY & DEBTS**

2 ORDERED that the prior marital community property residence has been
3 sold, with each party having received \$50,000 from the net proceeds of sale, said
4 distribution is the respective party's sole and separate property, and it is further

5 ORDERED that Chalese's interest in the real property located at 2256
6 Grand Clover Lane, Las Vegas, NV 89156 is her sole and separate property; and it
7 is further

8 ORDERED that as to the issue of Adam's separate property interest in
9 the proceeds of the sale of the former marital residence, Adam's father testified
10 during Day 1 of Trial that he gave Adam a gift of equity when he sold the home to
11 Adam, which evidenced by gift of equity letter provided by the mortgage lender
12 and it was a part of the mortgage. The intent of the gift of equity was to give
13 Adam a gift, not Chalese. Thus, Adam has a separate property interest in the
14 proceeds from the sale of the home in the amount of \$85,000. The Abrams and
15 Mayo Client Trust Account is holding a total amount of \$92,599.99 and any
16 amount being held higher than the \$85,000, is \$7,599.99 which is community
17 property (\$3,799.99 each), distribution of which is outlined herein; and it us further

18 ORDERED that Chalese Solinger's remaining community property share
19 over the \$85,000 (\$3,799.99) shall be paid to her within five (5) days upon receipt
20 by The Abrams and Mayo Law Firm of Notice of Entry of this Decree; and it is
21 further

22 ORDERED that during the course of the litigation, there was an issue
23 regarding an "art collection"; there was no testimony during Trial and the Court
24 orders that this issue is moot; and it is further

25 ORDERED that the Plaintiff's 401k from the LV Defense Group, 401K
26 Plan (employee #100126) in the approximate amount of \$46,325.19 (as of
27 statement dated 12/31/2020-last provided into evidence) is to be divided equally
28 between the parties (\$23,162.60 each) and said distribution is the respective party's

1 sole and separate property. That should it be necessary, a Qualified Domestic
2 Relations Order (QDRO) will be obtained through QDRO Masters with the fee for
3 same divided equally between the parties, and both parties are to fully cooperate
4 with QDRO Masters in the preparation of same; and it is further

5 ORDERED that the Plaintiff is earning retirement (PERS) through his
6 employment with the Attorney General's Office. At such time said pension
7 becomes vested, the Defendant would be entitled to her community property share
8 from the commencement of employment through November 2021 under the time
9 rule pursuant to Gemma v. Gemma, 778 P.2d 429, 105 Nev. 458 (Nev., 1989) and
10 Fondi v. Fondi, 802 P.2d 1264, 106 Nev. 856 (Nev., 1990) and to select Option 2,
11 with regard to his PERS survivorship benefit; and that a Qualified Domestic
12 Relations Order (QDRO) will be obtained through QDRO Masters with the fee for
13 same divided equally between the parties, and both parties are to fully cooperate
14 with QDRO Masters in the preparation of same; and it is further

15 ORDERED that the Court confirms that both parties are in possession of
16 various other separate and/or community personal property, not mentioned herein,
17 and the property in each respective party's possession is their sole and separate
18 property; and it is further

19 ORDERED that in the event any property has been omitted from this
20 Decree that would have been community property or otherwise jointly held
21 property under the law applicable as of the date hereof the concealing or
22 possessory party will transfer or convey to the other party, at the other party's
23 election: 1) the full market value of the other party's interest on the date of this
24 Decree, plus statutory interest through and including the date of transfer or
25 conveyance; or 2) the full market value of the other party's interest at the time that
26 party discovers that he or she has an interest in such property, plus statutory
27 interest through and including the date of transfer or conveyance; or 3) an amount
28

1 of the omitted property equal to the other party's interest therein, if it is reasonably
2 susceptible to division; and it is further

3 **ATTORNEY'S FEES AND COSTS**

4 In this matter, there was a large disparity of income. Adam Solinger is an
5 attorney working at the Attorney General's Office and Chalese is a childrens'
6 hairdresser, after spending the majority of the marriage as a stay-at-home mother.

7 This would indicate the necessity of an award of attorney's fees to
8 Chalese, from the beginning of this action. See Sargeant -v- Sargeant, 88 Nev.
9 223, 495 P.2d 618 (1972), wherein the Nevada Supreme Court stated that a spouse
10 must be afforded their day in court without destroying their financial position. This
11 would imply that they should be able to meet their adversary in the courtroom on
12 an equal basis.

13 See Albios v. Horizon Crntys., Inc., 122 Nev. 409, 417, 132 P.3d 1022,
14 1028 (2006) (explaining that the district court generally may not award attorney
15 fees absent authority under a statute, rule, or contract).

16 See Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455 P.2d 31
17 (1969) factors. See Miller v. Wilfong, 121 Nev. 619, 623, 119 P.3d 727, 730 (2005)
18 (providing that the district court must consider the Brunzell factors when awarding
19 attorney fees).

20 See Brunzell v Golden Gate National Bank, 85 Nev. 345, 349, 455 P.2d
21 31, 33 (1969)- factors for attorney's fees: (a) Qualifications of Counsel; (b)
22 Character of work to be done; (c) Actual work performed; (d) Result. See also:
23 NRS 125.150(3) (giving the district court authority to grant attorney fees in divorce
24 proceedings); Miller v. Wilfong, 121 Nev. 619, 624-25, 119 P.3d 727, 731 (2005)
25 (finding attorney provided in the record on appeal is presumed to support the
26 district court's decision. Cuzze v. Univ. & Cmty. Coll. Sys. of Nev., 123 Nev. 598,
27 603, 172 P.3d 131, 135 (2007), fee awards reasonable when the record supported
28 the Brunzell factors and the district court found an income disparity); Wright v.

1 Osburn, 114 Nev. 1367, 1370, 970 P.2d 1071, 1073 (1998) (finding disparity of
2 income a factor of consideration when awarding attorney fees).

3 Further, the district court is required to make such findings in awarding
4 attorney fees; see Stubbs v. Strickland, 129 Nev. 146, 152 n.1, 297 P.3d 326, 330
5 n.1 (2013) (explaining that a district court must "make findings regarding the basis
6 for awarding attorney fees and the reasonableness of an award of attorney fees").

7 EDCR 7.60 allows attorneys' fees as sanctions when a party "presents to
8 the court a motion or an opposition to a motion which is obviously frivolous,
9 unnecessary or unwarranted," "[s]o multiplies the proceedings in a case as to
10 increase costs unreasonably and vexatiously," or "[f]ails or refuses to comply with
11 [the Eighth Judicial District Court's] rules." The plain language of EDCR 7.60
12 makes no exception and instead can apply to any motion, regardless of the
13 underlying case.

14 NRS 18.010(2)(b) provides for attorneys' fees "[w]ithout regard to the
15 recovery sought," and therefore an award of a money judgment is not a
16 prerequisite when seeking fees under NRS 18.010(2)(b). See, e.g., Trs. of the
17 Plumbers & Pipefitters Union Local 525 Health & Welfare Trust Plan v.
18 Developers Sur. & Indem. Co., 120 Nev. 56, 63, 84 P.3d 59, 63 (2004) ("In 1985,
19 the Legislature authorized the district court to award attorney fees 'without regard
20 to the recovery sought, when the court finds that the claim, counterclaim,
21 cross-claim or third-party complaint or defense of the opposing party was brought
22 without reasonable ground or to harass the prevailing party.'").

23 See, Cuzze v. Univ. & Cmty. Coll. Sys. of Nev., 123 Nev. 598, 603, 172
24 P.3d 131, 135 (2007), fee awards reasonable when the record supported the
25 Brunzell factors and the district court found an income disparity); Wright v.
26 Osburn, 114 Nev. 1367, 1370, 970 P.2d 1071, 1073 (1998) (finding disparity of
27 income a factor of consideration when awarding attorney fees).

1 See, Logan v. Abe, 131 Nev. Adv. Op. 31, 350 P.3d 1139, (Nev., 2015),
2 fees are appropriate even if third parties paid the fees on litigant's behalf.
3

4 * * * * *

5 This Court's findings herein and a review of this matter reveals the level
6 at which Adam prosecuted this divorce case, persistent emergency motions on
7 Order Shortening Time, basically all seeking to have the Court reduce Chalese's
8 time share on some false claim/complaint by Adam. This Court considers this
9 level of prosecution was intended to harass, was frivolous and unnecessarily
10 extending litigation, causing unnecessary delay, and to increase the cost of
11 litigation, and when added to the previously found the level at which Adam
12 prosecuted this matter in a scorched earth litigation tactic, requires fees to be
13 awarded due to Adam's unwarranted behavior and his bad faith tactics.

14 In this matter there has been an extremely large disparity in the income of
15 the parties. Adam is an attorney, who also benefits the financial generosity of his
16 parents. Conversely, Chalese spent her time during the parties marriage as a stay-
17 at-home mother, supporting Adam's quest to become an attorney. Chalese works
18 as a hairdresser for children, without further training anywhere near that of Adam.

19 Throughout this litigation, Adam has been in the superior financial
20 position, as well as authoring his own motions (since he is an attorney), leaving
21 Chalese in a position of seeking counsel to properly represent her rights, preparing
22 Oppositions, etc., without sufficient funds, as she was unable to author her
23 documents herself. She truly was left without choice in that she required her own
24 attorney to represent her.

1 Chalese has had to retain three different attorneys/firms in this matter.

2 1. Louis C. Schneider, Esq. - filed and properly adjudicated an
3 Attorney's Lien-- the prior judge reduced an award of attorney's fees in the amount
4 of \$10,875.00, to judgment in its Order filed August 19, 2020, but stayed
5 enforcement until the Court's final determination. This left Chalese without funds
6 for an attorney, and then the payment of the earned (but reduced) fees was stayed.
7

8 2. Pecos Law Group - multiple attorneys and staff involved -
9 submitted a Memorandum of Fees and Costs with Brunzell factors on March 22,
10 2022 for a total amount of Attorney's Fees & Costs requested of \$204,760.12. This
11 Firm's involvement in this matter was for the majority of the persistent litigation
12 (1999-2001) instituted by Adam, discovery, multiple Court hearings, etc., and the
13 first day of trial.

14 3. Alex Ghibardo, P.C. - Michancy Cramer, Esq. submitted a
15 Memorandum of Fees and Costs with Brunzell factors on May 12, 2022 for a total
16 amount of Attorney's Fees & Costs requested of \$10,000 charged as a flat fee. This
17 Firm appeared for Chalise as of December 2021 and adequately conducted the
18 remaining trial days, and post-trial matters.

19 EXPERT WITNESS FEES

20 NRS 18.005(5) states: Reasonable fees of not more than five expert
21 witnesses in an amount of not more than \$1,500 for each witness, unless the court
22 allows a larger fee after determining that the circumstances surrounding the
23 expert's testimony were of such necessity as to require the larger fee.

24 The Pecos Law Group billing statements indicates that Chalese's expert
25 witness, Dr. William O'Donohue's fee, which was paid, was in the amount of
26 \$4,750.00.
27
28

1 Pursuant to the factors as enumerated in *Frazier v. Drake*, 131 Nev. 632,
2 650-51, 357 P.3d 365, 377-78 (Ct. App. 2015) (listing factors the court should
3 consider when determining whether to award more than \$1500 under NRS
4 18.005(5)): including "the importance of the expert's testimony to the prevailing
5 party, the degree to which the expert's opinion aided the trier of fact in deciding the
6 case[,] the extent and nature of the work performed by the expert," and the
7 reasonableness of the expert's fees.

8 The Court finds that Dr. O'Donohue's testimony was crucial as his
9 testimony in some ways agreed with, coincided with, provided further insight to,
10 and/or was opposite to that of the only other expert, Dr. John Paglini, in his scope
11 of reviewing/rebutting Dr. Paglini. Given that the Court has already noted herein
12 that Dr. Paglini's report/testimony was missing some crucial situational facts,
13 which were covered, in part, by Dr. O'Donohue, and provided the Court with a
14 more complete picture of the situation in this matter. The excess of approximately
15 \$3,200 over the limit in 18.005(5) is not excessive under the circumstances, and
16 the Court is allowing the entire expert witness fee of \$4,750.00.

17 ATTORNEYS FEES AND COSTS

18 THEREFORE, given all of the Memorandums of Fees and Costs, Brunzell
19 factors, pertinent statute(s) and/or case precedent, It Is Hereby
20

21 ORDERED this Court confirms the previously adjudicated \$10,875
22 attorney's fees award to Louis Schneider, Esq., and hereby lifts the stay of
23 execution; and that the Abrams and Mayo Law Firm holding proceeds in their
24 Client Trust account is instructed to distribute the \$10,875 to Louis Schneider,
25 Esq., within five (5) days upon receipt of this Notice of Entry of this Decree to
26 satisfy his judgment; and it is further
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28

1 ORDERED that the Court has reviewed the Brunzell factors in the
2 Memorandum of Fees and Costs from the law firm of Alex Ghibaud, PC
3 (Michancy Cramer, Esq.) and find them appropriate and acceptable in light of the
4 preparedness and performance at trial of counsel. That the amount of \$10,000.00
5 was paid in full was a flat fee to the firm, and that reimbursement is due to Chalese
6 Solinger. That the Abrams and Mayo Law Firm are holding proceeds in their
7 Client Trust account is instructed to distribute the amount of \$10,000 to Chalese
8 Sollinger as and for reimbursement of attorney's fees paid within five (5) days
9 upon receipt of Notice of Entry of this Decree; and it is further

10 ORDERED that that the Court has reviewed the Brunzell factors in the
11 Memorandum of Fees and Costs from the law firm of Pecos Law Group. The
12 Pecos Law Group represented Chalese during the bulk of the litigation, motion
13 practice, etc. leading up to the trial in this matter, and amassed the largest bill of
14 attorney's fees and costs of the three firms representing Chalese in this matter, at
15 \$204,000 inclusive. The Court has reviewed the Brunzell factors from this firm
16 and finds them appropriate and acceptable, especially in light of the level of
17 litigation from the Plaintiff for the two years of their representation of Chalese.

18 The amount of costs expended are the usual and customary costs
19 associated with litigation, i.e.: filing fees, witness fees (subpoena), document fees
20 (subpoena) and the like, and all are approved in the total amount of \$15,309.69
21 (inclusive of expert fee).

22 The Pecos Law Group gave courtesy credits of \$27,010.72, and provided
23 a "no Charge" in the amount of \$38,447.50, which was gracious of them, and same
24 is so acknowledged by the Court.

25 When added together, the total amount of fees and costs actually charged
26 in this matter was \$204,760.72, of which there is no amount due and owing to the
27 The Pecos Law Group, and are all reimbursable to Chalese Solinger.
28

1 IT IS FURTHER ORDERED, that Chalese Solinger is to be reimbursed
2 her attorney's fees and costs in the total amount of \$180,000.00 (inclusive of fees
3 and costs) of the total amount requested by The Pecos Law Group. That the
4 Abrams and Mayo Law Firm are holding proceeds in their Client Trust account
5 and is instructed to distribute the balance, after the payment to Louis Schneider,
6 Esq. (\$10,875), and Chalese Solinger (\$10,000 + \$3,799.99 community property
7 share) with a grand total of \$24,674.99, are to distribute the remaining balance of
8 the funds held in their CTA (\$67,835.00) to Chalese Sollinger as and for
9 reimbursement (as against the total to be paid of the Pecos Law Group fees) of
10 attorney's fees paid within five (5) days upon receipt of Notice of Entry of this
11 Decree. That the Abrams and Mayo Law Firm are to provide an "accounting" of
12 the funds held in trust and the disbursements thereunder within ten (10) days of the
13 disbursement deadline, same to be filed with the Court and served upon all
14 parties/counsel; and it is further

15 ORDERED that all remaining attorney's fees due and owing to Chalese
16 Solinger after the payments from the Abrams and Mayo CTA, in the approximate
17 amount of \$112,165.00, are owed by Adam Solinger, personally. Chalese Solinger
18 shall have judgment against Adam Solinger in said balance amount of
19 \$112,165.00, and same is reduced to judgment, with interest at the legal rate until
20 paid in full, collectable by any legal means, including a wage assignment, and it is
21 further

22 ORDERED, that once the distribution is filed by The Abrams and Mayo
23 Law Firm, this Court will also issue a separate order for judgment with the actual
24 balance due and owing; and it is further
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STATUTORY PROVISIONS

ORDERED that Both parties are required to provide their Social Security numbers on a separate form to the Court and to the Welfare Division of the Department of Human Resources pursuant to NRS 125.30. Such information shall be maintained by the Clerk in a confidential manner and not part of the public record; and it is further

ORDERED that:

NOTICE IS HEREBY GIVEN of the following provision of NRS 125C.0045(6):

PENALTY FOR VIOLATION OF ORDER: THE ABDUCTION, CONCEALMENT OR DETENTION OF A CHILD IN VIOLATION OF THIS ORDER IS PUNISHABLE AS A CATEGORY D FELONY AS PROVIDED IN NRS 193.130. NRS 200.359 provides that every person having a limited right of custody to a child or any parent having no right of custody to the child who willfully detains, conceals or removes the child from a parent, guardian or other person having lawful custody or a right of visitation of the child in violation of this court, or removes the child from the jurisdiction of the court without the consent of either the court or all persons who have the right to custody or visitation is subject to being punished for a category D felony as provided in NRS 193.130.

NOTICE IS HEREBY GIVEN that the terms of the Hague Convention of October 25, 1980, adopted by the 14th Session of the Hague Conference on Private International Law apply if a parent abducts or wrongfully retains a child in a foreign country. The parties are also put on notice of the following provisions in NRS 125C.0045(8):

If a parent of the child lives in a foreign country or has significant commitments in a foreign country:

(a) The parties may agree, and the court shall include in the order for custody of the child, that the United States is the country of habitual residence of the child for the purposes of applying the terms of the Hague Convention as set forth in subsection 7.

(b) Upon motion of one of the parties, the court may order the parent to post a bond if the court determines that the parent poses an imminent risk of wrongfully removing or concealing the child outside the country of habitual residence. The bond must be in an amount determined by the court and may be used only to pay for the cost of locating the child and returning him to his habitual residence if the child is wrongfully removed from or concealed outside the country of habitual residence. The fact that a parent has significant commitments in a foreign country

1 does not create a presumption that the parent poses an imminent risk of wrongfully
2 removing or concealing the child.

3
4 **NOTICE IS HEREBY GIVEN** that the parties are placed on notice of
5 the following provisions in NRS 125C.0065:

6 1. If joint physical custody has been established pursuant to an order, judgment or
7 decree of a court and one parent intends to relocate his or her residence to a place
8 outside of this State or to a place within this State that is at such a distance that
9 would substantially impair the ability of the other parent to maintain a meaningful
10 relationship with the child, and the relocating parent desires to take the child with
11 him or her, the relocating parent shall, before relocating:

12 (a) Attempt to obtain the written consent of the non-relocating parent to
13 relocate with the child;

14 (b) If the non-relocating parent refuses to give that consent, petition the
15 court for primary physical custody for the purpose of relocating.

16 2. The court may award reasonable attorney's fees and costs to the relocating
17 parent if the court finds that the non-relocating parent refused to consent to the
18 relocating parent's relocation with the child:

19 (a) Without having reasonable grounds for such refusal; or

20 (b) For the purposes of harassing the relocating parent.

21 3. A parent who relocates with a child pursuant to this section before the court enters
22 an order granting the parent primary physical custody of the child and permission to
23 relocate with the child is subject to the provisions of NRS 200.359

24 This provision does not apply to vacations outside Nevada planned by either party.

25 **NOTICE IS HEREBY GIVEN** that they are subject to the provisions of
26 NRS 31A.025 to 31A.240, inclusive, the parent obligated to pay child support shall
27 be subject to wage assignment by that parent's employer should that parent
28 become more than thirty days delinquent in said child support payments.

NOTICE IS HEREBY GIVEN that either party may request a review of
child support pursuant to NRS 125B.145 at least every three years to determine
whether the order should be modified or adjusted.

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OTHER PROVISIONS

ORDERED that the parties herein sign any and all documents that are reasonably necessary and appropriate to facilitate, as well as to effectuate the transfer of the property herein awarded, and that should any party fail to execute the necessary documents within sixty (60) days after the Notice of the Entry of the Decree of Divorce to comply with the terms herein, either party may apply to the Court, through ex-parte application, properly served on the other party, a request pursuant to NRCP 70(a) for appointment as attorney in fact to execute any and all documentation necessary to effectuate the terms of this Decree; and it is further

ORDERED that the terms set forth in this Decree of Custody may not be changed, modified, or terminated orally, and any such change, modification, or termination may only be made by a written instrument executed by the parties, or by further Order of the Court.

THIS IS A FINAL DECREE

Dated this 25th day of May, 2022

A handwritten signature in black ink, appearing to be 'MP', written over a horizontal line.

**449 FAA A35D 2301
Mary Perry
District Court Judge**

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Adam Michael Solinger, Plaintiff | CASE NO: D-19-582245-D
7 vs. | DEPT. NO. Department P
8 Chalese Marie Solinger,
9 Defendant.

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

15 Service Date: 5/25/2022

16 Jack Fleeman	jack@pecoslawgroup.com
17 Alicia Exley	alicia@pecoslawgroup.com
18 Adam Solinger	adam@702defense.com
19 Louis Schneider	lcslawllc@gmail.com
20 Alex Ghibaudo	alex@glawvegas.com
21 Michancy Cramer	michancy@glawvegas.com
22 Adam Solinger	attorneyadamsolinger@gmail.com
23 Alex Ghibaudo	alex@glawvegas.com

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