IN THE SUPREME COURT OF THE STATE OF NEVADA

INDICATE FULL CAPTION:

ALUNA FESSLER a/k/a Aluna Perry
Appellant
vs.
JASON FESSLER
Respondent

No. 88996

Electronically Filed
Aug 14 2024 03:20 PM
Elizabeth A. Brown
Clerk of Supreme Court

DOCKETING STATEMENT
CIVIL APPEALS

GENERAL INFORMATION

Appellants must complete this docketing statement in compliance with NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, identifying issues on appeal, assessing presumptive assignment to the Court of Appeals under NRAP 17, scheduling cases for oral argument and settlement conferences, classifying cases for expedited treatment and assignment to the Court of Appeals, and compiling statistical information.

WARNING

This statement must be completed fully, accurately and on time. NRAP 14(c). The Supreme Court may impose sanctions on counsel or appellant if it appears that the information provided is incomplete or inaccurate. *Id.* Failure to fill out the statement completely or to file it in a timely manner constitutes grounds for the imposition of sanctions, including a fine and/or dismissal of the appeal.

A complete list of the documents that must be attached appears as Question 27 on this docketing statement. Failure to attach all required documents will result in the delay of your appeal and may result in the imposition of sanctions.

This court has noted that when attorneys do not take seriously their obligations under NRAP 14 to complete the docketing statement properly and conscientiously, they waste the valuable judicial resources of this court, making the imposition of sanctions appropriate. *See* KDI Sylvan Pools v. Workman, 107 Nev. 340, 344, 810 P.2d 1217, 1220 (1991). Please use tab dividers to separate any attached documents.

Docket 88996 Document 2024-28815

1. Judicial District Eighth Department A

County Clark Judge Mari D Parlade

District Ct. Case No. D-23-662572-D

2. Attorney filing this docketing statement:

Attorney Lisa M. Szyc Telephone 702-872-5555

Firm Backus | Burden

Address 3050 S. Durango Drive
Las Vegas, NV 89117

Client(s) Aluna Fessler a/k/a Aluna Perry

If this is a joint statement by multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

3. Attorney(s) representing respondents(s):

Attorney Molly Rosenblum Telephone 702-433-2889

Firm Rosenblum Allen Law Firm

Address 376 E Warm Spring
Las Vegas, NV 89119

Client(s) Jason Fessler (in District Court proceedings only)

Attorney Shelia Tajbakhsh Telephone 702-433-2889

Firm Rsenblum Allen Law Firm

Address 376 E Warm Spring
Las Vegas, NV 89119

Client(s) Jason Fessler (in District Court Proceedings Only

(List additional counsel on separate sheet if necessary)

4. Nature of disposition below (check all that apply):

- ☐ Judgment after bench trial
- ☐ Judgment after jury verdict
- ☐ Summary judgment
- ☐ Default judgment
- ☐ Grant/Denial of NRCP 60(b) relief
- ☐ Grant/Denial of injunction
- ☐ Grant/Denial of declaratory relief
- ☐ Review of agency determination
- ☐ Dismissal:
  - ☐ Lack of jurisdiction
  - ☐ Failure to state a claim
  - ☐ Failure to prosecute
  - ☐ Other (specify): _____
- ☒ Divorce Decree:
  - ☒ Original ☐ Modification
- ☐ Other disposition (specify): _____

5. Does this appeal raise issues concerning any of the following?

- ☐ Child Custody
- ☐ Venue
- ☐ Termination of parental rights

6. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

N/A

7. Pending and prior proceedings in other courts. List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (*e.g.*, bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:

N/A

8. Nature of the action. Briefly describe the nature of the action and the result below:

This is a bifurcated divorce proceeding. The parties submitted on the issues of child custody, child support and other issues related to the child and are awaiting a determination from the District court on the same. The parties were able to reach several agreements regarding the financial issues between the parties, which is the subejct of this appeal. However, there is a dispute as to attorney's fees. Aluna maintains that she properly asked for Sargeant v. Sargeant fees at the onset of the case and the same was never ruled by the District Court. When the financial issues were submitted to the District Court, Aluna, did not agree that the issues of attorney's fees were resolved. The parties submitted competing decrees of divorce and the District Court ultimately issued the Bifurcated Decree that wholly resolved attorney's fees without addressing the Sargeant v Sargeant request that was properly raised by Aluna at the onset of the case.

9. Issues on appeal. State concisely the principal issue(s) in this appeal (attach separate sheets as necessary):

(a) The District Court failed to make a ruling on Aluna's properly raised Sargent v. Sargent request at the when it was initially raised

(b) Aluna never waived her request for attorney fees made via Sargent v Sargent and the court made an errounous record during trial when the Court indicated the request was only ever made as a request for sanctions

(c) The District Court failed to consider Aluna's request and Aluna did not waive that request when the parties submitted the matter on the record wiht regard to the financial issues

(d) The District Court erred in failing to award Aluna attorney's fees

10. Pending proceedings in this court raising the same or similar issues. If you are aware of any proceedings presently pending before this court which raises the same or similar issues raised in this appeal, list the case name and docket numbers and identify the same or similar issue raised:

Counsel is not aware of any pending cases of the same of similar issues.

11. Constitutional issues. If this appeal challenges the constitutionality of a statute, and the state, any state agency, or any officer or employee thereof is not a party to this appeal, have you notified the clerk of this court and the attorney general in accordance with NRAP 44 and NRS 30.130?

- ☒ N/A
- ☐ Yes
- ☐ No

If not, explain:

12. Other issues. Does this appeal involve any of the following issues?

- ☐ Reversal of well-settled Nevada precedent (identify the case(s))
- ☐ An issue arising under the United States and/or Nevada Constitutions
- ☐ A substantial issue of first impression
- ☐ An issue of public policy
- ☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions
- ☐ A ballot question

If so, explain:

13. Assignment to the Court of Appeals or retention in the Supreme Court. Briefly set forth whether the matter is presumptively retained by the Supreme Court or assigned to the Court of Appeals under NRAP 17, and cite the subparagraph(s) of the Rule under which the matter falls. If appellant believes that the Supreme Court should retain the case despite its presumptive assignment to the Court of Appeals, identify the specific issue(s) or circumstance(s) that warrant retaining the case, and include an explanation of their importance or significance:

Pursuant to NRAP 17(b)(10) this case should be assiged to the Nevada Court of Appeals.

14. Trial. If this action proceeded to trial, how many days did the trial last? 2

Was it a bench or jury trial? Bench Trial

15. Judicial Disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?

N/A

TIMELINESS OF NOTICE OF APPEAL

16. Date of entry of written judgment or order appealed from 06/11/2024

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review:

17. Date written notice of entry of judgment or order was served 06/11/2024

Was service by:

☐ Delivery

☒ Mail/electronic/fax

18. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCP 50(b), 52(b), or 59)

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing.

☐ NRCP 50(b) Date of filing N/A

☐ NRCP 52(b) Date of filing N/A

☐ NRCP 59 Date of filing N/A

NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration may toll the time for filing a notice of appeal. *See* AA Primo Builders v. Washington, 126 Nev. ____, 245 P.3d 1190 (2010).

(b) Date of entry of written order resolving tolling motion N/A

(c) Date written notice of entry of order resolving tolling motion was served N/A

Was service by:

☐ Delivery

☐ Mail

19. Date notice of appeal filed 07/08/2024

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal:

20. Specify statute or rule governing the time limit for filing the notice of appeal, *e.g.*, NRAP 4(a) or other

NRAP4(a)(1)

SUBSTANTIVE APPEALABILITY

21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:

(a)

- ☒ NRAP 3A(b)(1)
- ☐ NRAP 3A(b)(2)
- ☐ NRAP 3A(b)(3)
- ☐ Other (specify)
- ☐ NRS 38.205
- ☐ NRS 233B.150
- ☐ NRS 703.376

(b) Explain how each authority provides a basis for appeal from the judgment or order:

22. List all parties involved in the action or consolidated actions in the district court:

(a) Parties:

Aluna Fessler a/k/a Plaintiff

Jason Fessler Defendant

Sterling Fessler, minor child

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

N/A

23. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.

Aluna Fessler a/k/a Wife/Mom in divorce case

Jason Fessler Husband/Dad in divorce case

Sterling Fessler, minor child - child of parties

24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?

☐ Yes

☒ No

25. If you answered "No" to question 24, complete the following:

(a) Specify the claims remaining pending below:

Child Custody

Child Support

All other unresolved regarding the minor child of the parties

(b) Specify the parties remaining below:

Aluna Fessler a/ka Wife/Mom in divorce/custody case

Jason Fessler Husband/Dad in divorce/custody case

Sterling Fessler - minor child of the parties

(c) Did the district court certify the judgment or order appealed from as a final judgment pursuant to NRCP 54(b)?

☒ Yes

☐ No

(d) Did the district court make an express determination, pursuant to NRCP 54(b), that there is no just reason for delay and an express direction for the entry of judgment?

☒ Yes

☐ No

26. If you answered "No" to any part of question 25, explain the basis for seeking appellate review (*e.g.*, order is independently appealable under NRAP 3A(b)):

27. Attach file-stamped copies of the following documents:

- The latest-filed complaint, counterclaims, cross-claims, and third-party claims
- Any tolling motion(s) and order(s) resolving tolling motion(s)
- Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross-claims and/or third-party claims asserted in the action or consolidated action below, even if not at issue on appeal
- Any other order challenged on appeal
- Notices of entry for each attached order

VERIFICATION

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

Aluna Fessler	Lisa M. Szyc, Esq.
Name of appellant	Name of counsel of record
08/14/2024	Lisa M. Szyc
Date	Signature of counsel of record

Nevada, Clark County
State and county where signed

CERTIFICATE OF SERVICE

I certify that on the 14th day of August , 2024 , I served a copy of this completed docketing statement upon all counsel of record:

☐ By personally serving it upon him/her; or

☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

Jason Fessler
1801 N. Green Valley Parkway Apt 2122
Henderson, Nevada 89146
Respondent

Dated this 14th day of August , 2024

Lisa M.. Szyc
Signature

EXHIBIT A

EXHIBIT A

Electronically Filed
02/09/2023
CLERK OF THE COURT

FILING CODE: COMD
Your Name: Aluna Fessler
Address: 5785 Holmby Ave
City, State, Zip: Las Vegas, NV 89146
Phone: 702-845-8789
Email: alunaperry@gmail.com
Self-Represented Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

Aluna Fessler Plaintiff, vs. Jason Fessler Defendant.	CASE NO.: D-23-668572-D DEPT: FBD

COMPLAINT FOR DIVORCE AND UCCJEA DECLARATION (With Children)

Plaintiff (*your name*) Aluna Fessler respectfully states:

1. **Residency.** Which spouse has been a resident of the State of Nevada for at least six weeks prior to filing this Complaint? ☒ Me / ☐ Defendant.

2. **Marriage.** The parties were married on (*date*) August 25, 2016 in (*city*) Las Vegas, (*state*) Nevada. The parties are incompatible.

3. **Pregnancy.** (☒ *check one*)
   - ☒ Neither spouse is pregnant.
   - ☐ The following spouse is pregnant: (*name of pregnant spouse*) _____. The other spouse ☐ is / ☐ is not the parent of the unborn child. The child is due to be born on (*date*): _____.
   - ☐ It is unknown whether either spouse is currently pregnant.

© 2022 Family Law Self-Help Center

* You are responsible for knowing the law about your case. For more information on the law, this form, and free classes, visit www.familylawselfhelpcenter.org or the Family Law Self Help Center at 601 N. Pecos Road. To find an attorney, call the State Bar of Nevada at (702) 382-0504.

4. **Children.** There are (*number*) 1 minor children in common born to or adopted by the parties. The name(s) and information is listed below:

Child's Name	Date of Birth	State of Residence	How long child lived in the state	Disability
Sterling Fessler	4-18-2017	NV	since birth	no

5. **UCCJEA Declaration.** Have the children lived in Nevada the last six months, or since birth? (☒ *check all that apply*)

☒ Yes, the child(ren) have lived in Nevada for the past six months, or since birth.

☐ No, the child(ren) have NOT lived in Nevada for the past six months.

a. **Living Arrangements Last 5 Years.** The children have lived with the following persons in the following places within the last five years:

Time Period (mo/yr – mo/yr)	Name of Person the Child(ren) Lived With	City and State	Child's Name (if not all children)
birth - present	both parents	Las Vegas, NV	Sterling Fessler
_____ - _____			
_____ - _____			
_____ - _____			
_____ - _____			

The names and current addresses of each non-parent the children lived with during the last five years are: n/a

b. **Participation in Other Cases.** Have you ever participated in any case concerning these children as a party, witness, or in some other capacity? (☒ *check one*)

☒ No.

☐ Yes, I have participated in the following cases concerning these children (*provide all specifics including the state, the court name, children involved, the case number and the date of the child custody order, if any*): _____

_____

_____

c. **Knowledge of Other Cases.** Do you know of any other case that could affect this case, such as other custody cases, domestic violence cases, protection order cases, or adoptions/terminations? (☒ *check one*)

☐ No.

☒ Yes, the following cases that could affect this case (*give all specifics including the state, the court name, the parties involved, the case number and the type of case*):
My 18 year old daughter, Taylor Perry DOB10-25-2004, has a TPO against Jason because he gave her drugs and alcohol and raped her when she was 17 years old. He has a violent history

d. **Person(s) Who Claim Custody / Visitation.** Is there anyone other than yourself or other parties to this case who has custody of the children or who can claim a right to custody or visitation with the children? (☒ *check one*)

☒ No.

☐ Yes, the following people have custody or can claim custody/visitation of the children: (*list names and addresses of anyone who claims custody/visitation rights*): _____

_____

_____

6. **Legal Custody.** *Legal custody refers to the ability to make major decisions about the child, such as medical care, education, and religious upbringing.* (☒ *check one*)

☐ The parties should share joint legal custody of the child(ren).

☒ Plaintiff should have sole legal custody of the child(ren).

☐ Defendant should have sole legal custody of the child(ren).

☐ Nevada is not the "home state" of the child(ren) and cannot enter custody orders.

7. **Physical Custody.** *Physical custody refers to the amount of time the child spends with each parent.* (☒ *check one*)

☐ **Joint Custody.** The parties should share joint physical custody of the child(ren) (each parent must have the child(ren) roughly 40% of the time, or 146 days per year). A proposed parenting timeshare and holiday schedule is attached as Exhibit 1.

☐ **Primary Custody.** The (☒ *check one*) ☐ Plaintiff / ☐ Defendant should have primary physical custody of the child(ren). A proposed parenting timeshare and holiday schedule is attached as Exhibit 1.

☒ **Sole Custody.** The (☒ *check one*) ☒ Plaintiff / ☐ Defendant should have sole physical custody of the child(ren).

☐ Nevada is not the "home state" of the child(ren) and cannot enter custody orders.

8. **Other Considerations.** The Court should consider the following issues in determining custody: (☒ *check all that apply*)

☒ Domestic Violence

☒ CPS Involvement

☐ Military Deployment

☐ State of Residency

☒ Other: Jason is a violent rapist

9. **Public Assistance.** Has either party ever received public assistance? (☒ *check one*)

☒ No, the parties in this case have never received public assistance.

☐ Yes, one or more parties now receives or has received public assistance.

10. **Parties' Incomes.** *The court needs to know both parties' gross monthly incomes to make sure child support is set correctly.*

Gross monthly income includes money received from work, social security, unemployment, pension/retirement, interest/investments, veteran's benefits, military allowances, etc.

It does not include SSI, SNAP, TANF, cash benefits from the county, or child support received.

My gross monthly income is (*insert amount*): $0 / OR ☐ unknown.

The other parent's gross monthly income is (*insert amount*): $10,800 / OR ☐ unknown.

11. Child Support. *Use the attached worksheet to figure out how much child support the court should order.* ***Complete the worksheet before filling out this section.*** (☒ *check one*)

☐ Child support should be paid by (*name of parent who should pay child support*)

Jason Fessler in the amount of $_____ per month.

This is based on: (☒ *check one*)

☐ The Child Support Worksheet calculation attached.
☐ The amount already established by the District Attorney, Family Support Division, case (*insert case number*) R_____.

☐ No child support is requested. (*Explain why not*): _____

_____

☒ I'm not sure how much child support should be paid, and ask the court to set support.

12. Wage Withholding. Should child support be paid through a wage garnishment? (☒ *check one*)

☒ Yes, a wage withholding order should be entered to secure payment of support.

☐ No, a wage withholding order should not be entered.

13. Back Child Support. Should back child support ("arrears") be ordered? (☒ *check one*)

☐ No, no back child support or arrears are requested.

☐ Child support arrears are being handled by the District Attorney, Family Support Division, case (*insert case number*) R_____ and should continue as ordered in that case.

☒ Yes, back child support should be paid by (*name of parent who should pay back child support*) Jason Fessler from (*date back child support should begin*) January 1, 2023 to present.

14. Child Care. Are there child care expenses? (☒ *check one*)

☒ No, there are no child care costs for either parent.

☐ Yes, the monthly child care costs for the child(ren) are: $_____. This amount should be paid by ☐ me only ☐ the other parent only ☐ both parents equally.

15. **Medical Coverage.** Medical support (medical, vision, and/or dental) must be provided for the child(ren). How will the children get medical support/insurance?

☐ Medicaid.

☒ Private / Employer Insurance. The monthly premium should be paid by ☐ me only ☒ the other parent only ☐ both parents equally.

☐ Other: _____

16. **Unreimbursed Medical Expenses.** How will medical expenses get paid if insurance does not cover a medical cost? (☒ *check one*)

☐ Any expenses not covered by insurance should be paid equally by both parties.

☒ Any expenses not covered by insurance should be paid by (*name of parent*) Jason Fessler due to the following extraordinary circumstances: (*explain*) I have no income. I am a housewife and student.

17. **"30/30 Rule."** The "30/30 Rule" provides that if a parent pays a medical or dental expense for a child that is not paid by insurance, that parent must send proof of payment of the expense to the other parent within 30 days of paying the expense. The other parent then has 30 days to reimburse the paying parent ½ the cost. Do you want the 30/30 rule ordered in your case? (☒ *check one*)

☒ Yes, the Court should order the 30/30 Rule for payment of all unreimbursed medical / dental expenses.

☐ No, the Court should not order the 30/30 Rule for payment of unreimbursed medical / dental expenses.

18. **Tax Deduction.** *IRS rules state that the custodial parent usually has the right to claim the child on their taxes. The custodial parent can waive this right by filling out IRS Form 8332. Talk to a tax professional if you are not sure what to do.* (☒ *check all that apply*)

☒ Plaintiff should claim the following children as dependents for tax purposes every year: (*insert child(ren)*'s names): Sterling Fessler

☐ Defendant should claim the following children as dependents for tax purposes every year: (*insert child(ren)*'s names): _____

☐ The tax deduction should alternate, with Plaintiff claiming the child(ren) in (☒ *check one*) ☐ even / ☐ odd years, and Defendant claiming the child(ren) the other years.

☐ The tax deduction should be allocated per federal law.

19. Community Property. (☒ *check one*)

☐ There is no community property to divide.

☐ Any community property has already been divided.

☒ I do not know the full extent of the community property.

☐ The community property should be divided as follows:

Property to Plaintiff:

1. _____
2. _____
3. _____
4. _____

Property to Defendant:

1. _____
2. _____
3. _____
4. _____

20. Community Debt. (☒ *check one*)

☐ There is no community debt to divide.

☐ Any community debt has already been divided.

☒ I do not know the full extent of the community debt.

☐ The community debt should be divided as follows:

Debts to Plaintiff:

1. _____
2. _____
3. _____
4. _____

Debts to Defendant:

1. _____
2. _____
3. _____
4. _____

21. Alimony. (☒ *check one*)

☐ No spousal support is requested.

☒ Plaintiff should pay $ 2500 per month in spousal support for the next (*number*) 3 years.

☐ Defendant should pay $_____ per month in spousal support for the next (*number*) _____ years.

22. Name Change. (☒ *check one*)

☐ Plaintiff does not request a name change.

☒ Plaintiff would like to be restored to his/her former name of (*insert former name you would like to go back to*) Aluna Mercy Perry.

23. If Plaintiff is able to hire counsel, attorney's fees and costs are requested.

Plaintiff requests:

1. That the marriage existing between Plaintiff and Defendant be dissolved and that Plaintiff be granted an absolute Decree of Divorce and that each of the parties be restored to the status of a single, unmarried person;
2. That the Court grant the relief requested in this Complaint; and
3. For such other relief as the Court finds to be just and proper.

DATED (*month*) February (*day*) 9, 2023.

Submitted By: (*your signature*) ▸ /s/ Aluna Fessler

(*print your name*) Aluna Fessler

VERIFICATION

Under penalty of perjury, I declare that I am the Plaintiff in the above-entitled action; that I have read the foregoing Complaint and know the contents thereof; that the pleading is true of my own knowledge, except for those matters therein contained stated upon information and belief, and that as to those matters, I believe them to be true.

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

DATED (*month*) February (*day*) 9, 2023.

Submitted By: (*your signature*) ▸ /s/ Aluna Fessler

(*print your name*) Aluna Fessler

EXHIBIT 1: Parenting Timeshare and Holiday Schedule

☒ No Visitation Requested Because: (*explain*) Jason is a violent sex offender

Regular Schedule: ***Be very specific. Include the times and days of the week for each parent's timeshare.*** *(ex.: Mom: Saturday 7pm – Wednesday 3pm, Dad: Wednesday 3pm – Saturday 7pm)*	Jason should not have unsupervised contact with Sterling. ~~Jason gave Sterling's sister drugs and alcohol and then he~~ raped her. He should not be around any children. If he has contact with Sterling, it should be in a supervised, ~~therapeutic setting.~~
Summer Schedule:	☒ Same as the regular schedule. ☐ Other: _____
Mother's Day and Mother's Birthday:	☒ Mother every year from 9am – 7pm. ☐ Other: _____
Father's Day and Father's Birthday:	☐ Father every year from 9am – 7pm. ☒ Other: Mom
Child's Birthday:	☐ *Even years* with (*parent*) _____. *Odd years* with (*parent*) _____. *Time shall be from 9am – 7pm.* ☒ Other: mom always
3 Day Weekends:	☐ *Even Years*: MLK Jr. Day, Memorial Day, Labor Day with (*parent*) _____, President's Day, Independence Day, Nevada Admissions Day with the other parent. *Odd Years*: MLK Jr. Day, Memorial Day, Labor Day with (*parent*) _____, President's Day, Independence Day, Nevada Admissions Day with the other parent. *Time begins when school lets out the day before the holiday weekend (or 3pm if no school), and ends the day following the holiday weekend when school resumes (or 9am).* **If Independence Day falls on a Tuesday, Wednesday, or Thursday, the time shall be from July 3 at 9am until July 5 at 9am.** ☒ Other: mom always

Easter / Spring Break:	☐ Even years with (*parent*) _____. Odd years with the other parent. *Time shall begin the day school lets out until noon the day before school resumes.* ☒ Other: mom always
Thanksgiving:	☐ Odd years with (*parent*) _____. Even years with the other parent. *Time shall begin the day school lets out until noon the day before school resumes.* ☒ Other: mom always
Winter Break / Christmas:	☐ Segment 1 (Christmas) consists of the day school lets out until December 26 at noon. Segment 2 (New Year's) consists of December 26 at noon until noon the day before school resumes. *Even years*: segment 1 with (*parent*) _____, segment 2 with the other parent. *Odd years*: segment 1 with (*parent*) _____, segment 2 with the other parent. ☒ Other: always with mom
Other Holidays:	All holidays should be with mom. Jason is a violent sex offender and should not have unsupervised contact. Contact should be supervised in a therapeutic setting.
Vacation:	☒ The parents will not establish a formal vacation plan, and will instead mutually agree on vacation days and times with the child(ren). ☐ Each parent may have up to (*number*) _____ vacation days per year with the child(ren). The parent shall notify the other parent of the vacation and provide a general vacation itinerary at least (*number*) _____ days before the planned vacation. **Vacation time is not allowed during a holiday allotted to the other parent.**

Child Support Worksheet

① The Other Parent's Information

How much money does the other parent make every month? (Estimate if you do not know. A GMI worksheet is attached if you need help.)

Figure out the other parent's gross monthly income. This includes money received from employment, social security, unemployment, pension/retirement, interest/investments, etc.
It does not include SSI, SNAP, TANF, cash benefits from the county, or child support received.

I believe the other parent makes $ 10,800 **per month** (this is "Gross Monthly Income")

**If this number is more than $6000, STOP. This worksheet will not apply.*

Visit nvchildsupportguidelinescalculator.azurewebsites.net/getobligation.aspx to find the appropriate amount.

Determine what the other parent's child support obligation would be:

Gross Monthly Income (from above) $ 10,800 **X** **.16** (for 1 child) **.22** (for 2 children) **.26** (for 3 children) **.28** (for 4 children) Add .02 for each additional child =

Regular Child Support: $ 1,728.00

Does this parent earn less than $1699 per month?

☒ No. (skip to ②)
☐ Yes. The court may use the low-income child support schedule instead. (check the attached chart to find the right number to enter. Use this number in steps ③④ & ⑤)

Low Income Child Support: $ _____

② Your Information (complete this section even if you expect the other parent to pay child support)

How much money do you make every month? (A GMI worksheet is attached if you need help.)

Include money you get from employment, social security, unemployment, pension/retirement, interest / investments, etc. Do not include SSI, SNAP, TANF, cash benefits from the county, or child support received.

I make $ 0 **per month** (this is "Gross Monthly Income")

**If this number is more than $6000, STOP. This worksheet will not apply.*

Visit nvchildsupportguidelinescalculator.azurewebsites.net/getobligation.aspx to find the appropriate amount.

Determine what your child support obligation would be:

Gross Monthly Income (from above) $ 0 **X** **.16** (for 1 child) **.22** (for 2 children) **.26** (for 3 children) **.28** (for 4 children) Add .02 for each additional child =

Regular Child Support: $ 0.00

Do you earn less than $1699 per month?

☐ No. (skip to ③)
☒ Yes. The court may use the low-income child support schedule instead. (check the attached chart to find the right number to enter. Use this number in steps ③④ & ⑤)

Low Income Child Support: $ _____

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③ Joint Custody. Only fill out this section if you are asking for Joint Physical Custody.

Skip to ④ if you are asking for primary custody, sole custody, or visitation only.

Subtract the lower earning parent's amount of child support from the higher earning parent's amount.

Higher		Lower		Child Support Obligation		Name of higher income parent:
$ _____	-	$ _____	=	$ 0.00	paid by	_____

④ Adjustments.

- If you want primary or sole physical custody, the court uses the number in ① as the standard amount of child support the other parent would pay.
- If you want the other parent to have primary or sole physical custody, the court uses the number in ② as the standard amount of child support you would pay.
- If you want both parents to have joint physical custody, the court uses the number in ③ as the standard amount of child support.

You can ask for more or less child support than the amount in ① ② or ③ if you think any of the following factors apply. (☒ *check all that apply, or skip to ⑤ if none if these reasons apply*)

- ☐ Special educational needs
- ☐ A parent's legal responsibility to support others
- ☐ The value of services contributed by either parent
- ☐ Public assistance paid to support the child
- ☐ Cost of transportation to and from visitation
- ☒ The relative income of both households
- ☒ Any other necessary expenses for the benefit of the child
- ☒ The obligor's ability to pay

Explain: I have been a housewife and student for years. I am currently 2.5 years away from graduation. Jason's attack on my daughter has destroyed my family. I need support to finish school so that I can take care of my children in the future.

⑤ Final Child Support Amount Requested:

$ _____ paid by (*name*) Jason Fessler

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TO DETERMINE A PARENT'S GROSS MONTHLY INCOME ("GMI") FROM EMPLOYMENT

Annual Income	$
÷ by 112 months = **GMI**	$ 0.00

Biweekly Income	$
X 226 pay periods per year	0.00
÷ by 112 months = **GMI**	$ 0.00

Weekly Income	$
X 552 pay periods per year	0.00
÷ by 112 months = **GMI**	$ 0.00

Hourly Wage	$
# of hours worked per week	
Subtotal = hourly wage X # of hours per week	$ 0.00
X 552 pay periods per year	0.00
÷ by 112 months = **GMI**	$ 0.00

LOW INCOME CHILD SUPPORT SCHEDULE
FOR PARENTS WHO EARN LESS THAN $1699 PER MONTH

Child Support Obligation of Low-Income Payers
at 75% to 150% of the 2021 Federal Poverty Guidelines

	One Child		Two Children		Three Children		Four Children		Five Children	
Monthly Income Up To	Percent	Child Support Amount	Percent	Child Support Amount	Percent	Child Support Amount	Percent	Child Support Amount	Percent	Child Support Amount
$849	10.56%	$90	14.52%	$123	17.16%	$146	18.48%	$157	19.80%	$168
$880	10.75%	$95	14.79%	$130	17.48%	$154	18.82%	$166	20.16%	$177
$910	10.95%	$100	15.05%	$137	17.79%	$162	19.16%	$174	20.53%	$187
$940	11.14%	$105	15.32%	$144	18.11%	$170	19.50%	$183	20.89%	$196
$971	11.34%	$110	15.59%	$151	18.42%	$179	19.84%	$193	21.26%	$206
$1,001	11.53%	$115	15.86%	$159	18.74%	$188	20.18%	$202	21.62%	$216
$1,031	11.73%	$121	16.12%	$166	19.05%	$196	20.52%	$212	21.99%	$227
$1,062	11.92%	$127	16.39%	$174	19.37%	$206	20.86%	$222	22.35%	$237
$1,092	12.11%	$132	16.66%	$182	19.69%	$215	21.20%	$232	22.71%	$248
$1,122	12.31%	$138	16.92%	$190	20.00%	$224	21.54%	$242	23.08%	$259
$1,153	12.50%	$144	17.19%	$198	20.32%	$234	21.88%	$252	23.44%	$270
$1,183	12.70%	$150	17.46%	$207	20.63%	$244	22.22%	$263	23.81%	$282
$1,213	12.89%	$156	17.73%	$215	20.95%	$254	22.56%	$274	24.17%	$293
$1,244	13.09%	$163	17.99%	$224	21.26%	$265	22.90%	$285	24.54%	$305
$1,274	13.28%	$169	18.26%	$233	21.58%	$275	23.24%	$296	24.90%	$317
$1,304	13.47%	$176	18.53%	$242	21.90%	$286	23.58%	$307	25.26%	$329
$1,335	13.67%	$182	18.79%	$251	22.21%	$297	23.92%	$319	25.63%	$342
$1,365	13.86%	$189	19.06%	$260	22.53%	$307	24.26%	$331	25.99%	$355
$1,395	14.06%	$196	19.33%	$270	22.84%	$319	24.60%	$343	26.36%	$368
$1,426	14.25%	$203	19.60%	$279	23.16%	$330	24.94%	$356	26.72%	$381
$1,456	14.45%	$210	19.86%	$289	23.47%	$342	25.28%	$368	27.09%	$394
$1,486	14.64%	$218	20.13%	$299	23.79%	$354	25.62%	$381	27.45%	$408
$1,517	14.83%	$225	20.40%	$309	24.11%	$366	25.96%	$394	27.81%	$422
$1,547	15.03%	$232	20.66%	$320	24.42%	$378	26.30%	$407	28.18%	$436
$1,577	15.22%	$240	20.93%	$330	24.74%	$390	26.64%	$420	28.54%	$450
$1,608	15.42%	$248	21.20%	$341	25.05%	$403	26.98%	$434	28.91%	$465
$1,638	15.61%	$256	21.47%	$352	25.37%	$416	27.32%	$448	29.27%	$479
$1,668	15.81%	$264	21.73%	$363	25.68%	$428	27.66%	$461	29.64%	$494
$1,699	16.00%	$272	22.00%	$374	26.00%	$442	28.00%	$476	30.00%	$510

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EXHIBIT B

EXHIBIT B

Electronically Filed
06/11/2024 1:27 PM
CLERK OF THE COURT

DECD
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Nevada Bar No. 08242
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376 Warm Springs Road, Ste 140
Las Vegas, NV 89119
(702) 433-2889—Phone
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Email: staff@rosenblumlawlv.com
Attorney for Defendant

DISTRICT COURT—FAMILY DIVISION
CLARK COUNTY, NEVADA

ALUNA FESSLER, Plaintiff, **vs.** **JASON FESSLER,** Defendant.	Case No.: **D-23-662572-D** Dept. No.: **A**

BIFURCATED DECREE OF DIVORCE

This matter having come before the Court on April 19, 2024, for custody issues and May 2, 2024, for financial and other divorce related issues, for a non-jury trial on divorce and custody issues; and Defendant JASON FESSLER, present with his counsel, SHEILA TAJBAKHSH, ESQ. of the ROSENBLUM ALLEN LAW FIRM, and Plaintiff ALUNA FESSLER, present with her counsel LISA SYZC, ESQ., appearing pro bono. Also present were Our Nevada Judges.

Pursuant to NRS 125, the parties this matter to the Court for summary disposition on the issue of financials ONLY, not to include child support.

The parties were sworn and stipulated and agreed to the settlement terms for the financial portion of the divorce as follows:

THE COURT HEREBY FINDS that Plaintiff and Defendant are, have been and continue to be, for at least six (6) weeks prior to the commencement of this action, bona fide residents, physically present and domiciled in the State of Nevada.

THE COURT HEREBY FINDS that the parties were married on August 25, 2016, in Las Vegas, Nevada, and have ever since been husband and wife.

THE COURT HEREBY FINDS that since the marriage of the parties, they have become, and now are, incompatible, so as to render it impossible for them to continue as husband and wife and there is no possibility of reconciliation.

THE COURT HEREBY FINDS there is one (1) minor child born the issue of their marriage, to wit: to wit: Sterling Fessler, born on April 18, 2017 (6) (hereinafter "STERLING"). That there are no adopted children and to the best of Plaintiff's knowledge, she is not pregnant at this time.

THE COURT HEREBY FINDS that the Court will be issuing a written decision on the issue of custody, visitation, holiday schedules and child support.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND THEREFORE ORDERED, ADJUDGED, AND DECREED that the bonds of matrimony heretofore and now existing between Plaintiff and Defendant be, and the same are hereby wholly dissolved, and each of the parties hereto is hereby restored to the status of a single, unmarried person.

ASSET AND DEBT DISTRIBUTION

[Negotiations begin at VT 1:42:00]

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the martial residence, located at 5785 Holmby Avenue, Las Vegas, Nevada, shall be awarded to Defendant as his sole and separate property, subject to and encumbrance thereon.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant shall pay Plaintiff a total of $35,000.00 as and for Plaintiff's *Malmquist* share of the marital residence. That the payment shall be made to Plaintiff in full within seven (7) days of May 1, 2024. Plaintiff shall waive any and all remaining current and future interest in the Holmby residence.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff has been exclusively residing in the home since the inception of litigation. That the Plaintiff

shall vacate the residence no later than forty-five (45) days from May 1, 2024, at which time the residence will become Defendant's sole and separate property.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that prior to the Plaintiff vacating the residence, the Defendant shall be permitted to conduct a "walk through" of the home to ensure condition and check for necessary repairs. That the parties shall work with one another to facilitate a time for the Defendant to conduct the walk-though of the marital residence. Should the parties reach an impasse and be unable to facilitate the same, they will notify their respective counsel, who will work together to find a date and time for a walk-though to occur.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff shall be awarded the 2019 Lexus NX 350 as her sole and separate property, subject to and encumbrance thereon, indemnifying Defendant and holding him harmless.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff shall immediately assume the payments for the 2019 Lexus NX 350. That the Plaintiff shall have thirty (30) days from May 1, 2024, to begin the process to refinance the Lexus and remove Defendant's name from the loan and bring the registration on the vehicle current.

That the Plaintiff shall use a portion of the $35,000 received as and for her share of the marital residence in order to assist her in getting the Lexus refinanced and the registration current.

IT IS FURTHER STIPULATED AND AGRD AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant shall be awarded all other vehicles of the community, to include the dirt bike, the Rhino offroad vehicle, the Polaris RZR and the vehicle he is currently driving as his sole and separate property, subject to any encumbrance.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the parties have worked to create an A/B list for all additional property, furniture and furnishings inside the marital residence. That Plaintiff shall take the following as her sole and separate property free from claim from the Defendant:

a. The interior and exterior couches;
b. The 85-inch TV;
c. The mater bedroom set;
d. The spare bedroom set
e. The spare 55-inch TV;
f. Sterling's bedroom set;
g. The dining room table;
h. The MSI;
i. Two (2) Nespresso machines;
j. The chop saw;

k. Her wedding rings;

l. Any and all clothing, jewelry and personal effects.

That Defendant shall receive the following additional items as his sole and separate property, free from any claim by the Plaintiff:

a. His wedding rings;

b. The massive toolbox with tools;

c. The complete stereo system, speakers, subwoofer, etc.;

d. The work desk;

e. The HP laptop;

f. The appliances in the marital home (refrigerator, washer/dryer, dishwasher, microwave)

g. The gun safe;

h. The shed in the backyard;

i. The hunting tent and mount;

j. Hunting gear; and

k. Any and all clothing, jewelry and personal effects.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that any and all retirement accounts shall be divided pursuant to a QDRO and subject to the time rule. That the parties agree to split the cost of the QDRO preparation. The parties agree that the QDRO process will be started within 30 days and the loan taken out pre-

divorce by Jason will be assessed against his community property share per the previously entered stipulation.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the parties have identified community debt on their most recently filed Financial Disclosure Forms filed with the court. That the Defendant's most recent FDF was filed on March 20, 2024. Plaintiff's most recent FDF was filed on February 12, 2023. Defendant shall take the debt identified on the FDFs as his sole and separate property, indemnifying Plaintiff and holding her harmless.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that all bank accounts in the parties' respective name will remain their sole and separate property.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that neither party shall be paid spousal support and/or alimony moving forward. That Plaintiff waives her right to an award of spousal support.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that on May 1, 2024, Defendant made the <u>final</u> payment of $6,000 for temporary family support which includes payment of the expenses of the marital residence through the month of May 2024.

As of the day of this hearing, Defendant will no longer make the family support payment which includes expenses on the marital residence, and Plaintiff will be responsible for payment of the expenses on the marital residence until she vacates the property. (VC at 01:47:02)

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant may retain the life insurance policy on behalf of Plaintiff if he chooses to do so.

MISCELLANEOUS PROVISIONS

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiff shall remove her name from the joint account at the Credit Union that Defendant has been paying for. That Plaintiff shall remove her name no later than May 15, 2024.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant shall release Plaintiff's phone number though T-Mobile no later than May 15, 2024 so that Plaintiff may assume her own phone plan.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that each party will bear their own attorney's fees and costs. (VC at 01:45:40)

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff shall be restored to her maiden name and be known as ALUNA MERCY PARRY forward.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that the parties are placed in notice of the following:

> **Circular 230 Disclosure:** To ensure compliance with recently enacted U.S. Treasury Department Regulations, we are now required to advise you that, unless otherwise expressly indicated, any federal tax advice in this communication, including any attachments, is not intended or written to be used, and cannot be used, by anyone for the purpose of avoiding federal tax penalties that may be imposed by the federal government for promoting, marketing or recommending to another party any tax-related matters addressed herein.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that in the event any property has been omitted from this Decree that would have been community property or otherwise jointly-held property under the law applicable as of the date hereof, the concealing or possessory party will transfer or convey

to the other party, at the party's election(a) the full market value of the other party's interest on the date of this Decree, plus statutory interest through and including the date of transfer of conveyance; (b) the full market value of the party's interest at the time that party discovers that he or she has an interest in such property, plus statutory interest through and including the date of transfer of conveyance; or (c) an amount of the omitted property equal to the other party's interest therein, if it is reasonably susceptible to division.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that if any claim, action or proceeding is brought seeking to hold the one of the parties hereto liable on account of any debt, obligation, liability, act or omission assumed by the other party, the responsible party will, at his or her sole expense, defend the innocent party against any such claim or demand and he or she will indemnify, defend and hold harmless the innocent party.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that if any joint debt, obligation, liability, act or omission creating such liability has been omitted from the Decree and is subsequently discovered, either party may petition the Court for an allocation of that debt, obligation, liability, or liability arising from such act of omission.

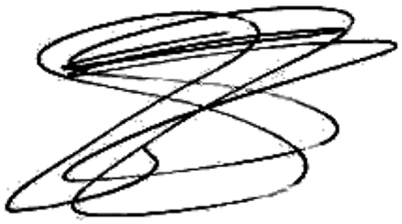
IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that except as otherwise specified herein, any and all property acquired, income received or liabilities incurred by either of the parties hereto from and after the date of entry of this Decree will be the sole and separate property of the one so acquiring the same, and each of the parties hereto respectively grants to the other al such future acquisitions of property as the sole and separate property of the one so acquiring the same and holds harmless and agree to indemnify the other party from any and all liabilities incurred.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that each party will execute all legal documents, certificates of title, bills, of sale, deeds or other evidence of transfer necessary to effectuate this Decree within five (5) days of the entry of this Decree. Should either party fail to execute any if said documents to transfer interest to the other, then it is agreed that this Decree will constitute a full transfer of the interest of one to the other, as herein provided, and it is further agreed the pursuant to NRCP 70, the Clerk of the Court will be deemed to have hereby been appointed and empowered to sign, on behalf of the non-signing party, any of the said documents of transfer which have not been executed by the party otherwise responsible for such.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that the parties waive their rights to a written notice of entry of decree or judgment, to request findings of fact and conclusions of law, to appeal, and to move for a trial on the issues of FINANCES only.

IT IS SO ORDERED.

Dated this 11th day of June, 2024



CD6 1A8 397B A141
Mari D. Parlade
District Court Judge

ROSENBLUM ALLEN LAW FIRM



SHEILA TAJBAKHSH, ESQ.
Nevada Bar No.15343
Rosenblum Allen Law Firm
376 East Warm Springs Rd. Ste. 140
Las Vegas, NV 89119
Attorney for Defendant

BACKUS BURDEN

LISA SZYC, ESQ.
Nevada Bar No. 11726
Backus Burden
3050 S. Durango Drive
Las Vegas, Nevada 89117
Attorney for Plaintiff

Rosenblum Allen LAW FIRM
Protecting Rights. Improving Lives.

Collins, Ryon <ryon@rosenblumlawlv.com>

Re: Fessler v. Fessler - Financial Decree

1 message

Tajbakhsh, Sheila <sheila@rosenblumlawlv.com> Thu, Jun 6, 2024 at 9:23 AM
To: Lisa Szyc <lisaszyc@backuslaw.com>
Cc: "Collins, Ryon" <ryon@rosenblumlawlv.com>, Liliana Pinto <lpinto@backuslaw.com>, Mia Alvarez <miaalvarez@backuslaw.com>, Reception <rec@backuslaw.com>

Lisa,

We AGREED the night we made the agreement that attorneys fees would be kept with the parties accruing them. You know it, I know it, and now you're making self serving arguments and trying to side step the agreement and candidly, the position is not well taken.

The reason it was stated my client would keep his fees is because your client had not paid a or accrued a DIME in fees and continues to enjoy that benefit,
It was stated CLEARLY on the record that the ONLY financial issue the Court is to decide is the issue or child support. The Court id well aware of this. Review the video. Interestingly, after all that, you still felt it was appropriate to file for attorneys fees!! We will NOT be changing the decree and you may submit your own competing decree. My client continues to accrue fees based upon the inaction and game playing of Aluna throughout litigation. Lastly there was no "tone" in Ryon's email. His tone has matched the exact posture that you and Ms. Cramer have had in ALL communications on this case.
Any and all emails can be directed at me in the future. Thank you,

Sheila Tajbakhsh, Esq. | Senior Associate Attorney
Rosenblum Allen Law Firm
376 East Warm Springs Road
Suite 140
Las Vegas, Nevada 89119
Ph: (702) 433-2889
E: Sheila@rosenblumlawlv.com

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On Thu, Jun 6, 2024 at 9:02 AM Lisa Szyc <lisaszyc@backuslaw.com> wrote:

> Ryon,
>
> First of all, please do not speak to me in such a rude tone. I have never addressed you in this manner. There have been several emails about this case, so I apologize for any confusion regarding my track changes on the incorrect version of the decree. Mind you, it was your office in which caused for more than one version to be generated initially.
>
> Secondly, although the parties agreed that Jason's last community property payment to Aluna would be in May, there was no express agreement on the record that Aluna would pay the expense as stated in your version of the decree, hence my proposed changes. I challenge you to provide a video citation proving otherwise.

Further, with respect to attorney fees, although Jason may have agreed to pay his own attorney fees, as is clearly indicated, and highlighted several times in my closing brief and throughout the video record during the trial, my client DID in fact make a request for *Sargeant* fees at the onset of the case. As you should be aware, this issue has never been ruled on; therefore, I cannot stipulate that each party pay their own fees and costs, not to mention said stipulation is not supported by the video record.

For these reasons, if you insist on submitting the aforementioned decree, I will have no choice but to address these concerns at today's hearing and submit a competing decree.

Lisa M. Szyc, Esq.

BACKUS | BURDEN

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Las Vegas, Nevada 89117

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From: Collins, Ryon <ryon@rosenblumlawlv.com>
Sent: Wednesday, June 5, 2024 1:01 PM
To: Liliana Pinto <lpinto@backuslaw.com>
Cc: Lisa Szyc <lisaszyc@backuslaw.com>; Reception <rec@backuslaw.com>; Mia Alvarez <miaalvarez@backuslaw.com>; Sheila Tajbakhsh <sheila@rosenblumlawlv.com>
Subject: Re: Fessler v. Fessler - Financial Decree

Good afternoon,

Please find attached the partially revised bifurcated decree of divorce. Please note that the revisions that your office made were on the wrong document despite the correct one being noted as received.

As to the question regarding payment of expenses of the marital residence, please see the video at approximately 1:47:02 through 1:47:27 in which it is stated that the May payment is our client's final payment. Regarding the revision to attorney fees, please see the video at 1:45:40 through 1:45:45 in which Sheila states "My client will keep his own attorney fees." Considering your client does not have any attorney's fees we feel this stipulation is accurate.

With the hearing scheduled for tomorrow please reply back by 3:30pm if you approve of the attached decree. If we do not hear back from you we will submit the decree and you are, of course, welcome to submit a competing decree pursuant to EDCR.

Thank you.

Best Regards,

Ryon Collins

Paralegal for Sheila Tajbakhsh, Esq.

Rosenblum Allen Law Firm

376 East Warm Springs Road, Suite 140

Las Vegas Nevada 89119

(702) 433-2889

In Office Hours: Monday - Thursday: 8:00 am to 2:00 pm
Available by Phone and Email: Monday - Thursday: 3:00 pm to 6:00 pm & Friday 8 am to 12 pm

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Please consider the environment before printing this email.

On Tue, Jun 4, 2024 at 3:24 PM Liliana Pinto <lpinto@backuslaw.com> wrote:

> Good afternoon,
>
> Please see the attached document with Ms. Szyc's edits to the Financial Decree in the above mentioned matter.
>
> Further, I would like to follow up on the status of the proposed order by Ms. Szyc following the hearing on May 2, 2024. Please advise with any suggestions or changes to be made to the order.
>
> Should you have any questions or concerns please feel free to reach out.

Best,

Liliana Pinto | Legal Assistant

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(702) 872 – 5545 (f)

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From: Collins, Ryon <ryon@rosenblumlawlv.com>
Sent: Monday, June 3, 2024 3:23 PM
To: Lisa Szyc <lisaszyc@backuslaw.com>
Cc: Reception <rec@backuslaw.com>; Mia Alvarez <miaalvarez@backuslaw.com>; Liliana Pinto <lpinto@backuslaw.com>; Sheila Tajbakhsh <sheila@rosenblumlawlv.com>
Subject: Fessler v. Fessler - Financial Decree

Good afternoon Lisa,

Have you been able to review our decree regarding finances? This needs to be submitted as soon as possible considering the letter we received from the department. Thank you.

Best Regards,

Ryon Collins

Paralegal for Sheila Tajbakhsh, Esq.

Rosenblum Allen Law Firm

376 East Warm Springs Road, Suite 140

Las Vegas Nevada 89119

(702) 433-2889

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Rosenblum Allen LAW FIRM
Protecting Rights. Improving Lives.

Collins, Ryon <ryon@rosenblumlawlv.com>

RE: Fessler adv. Fessler- Financial Decree

1 message

Lisa Szyc <lisaszyc@backuslaw.com> Fri, May 24, 2024 at 5:29 PM
To: "Tajbakhsh, Sheila" <sheila@rosenblumlawlv.com>
Cc: Ryon Collins <ryon@rosenblumlawlv.com>

Thank you and no worries, I have not opened the other one yet.

Lisa M. Szyc, Esq.

BACKUS | BURDEN

3050 South Durango Drive

Las Vegas, Nevada 89117

(702) 872-5555

(702) 872-5545 (*f*)

www.backuslaw.com

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From: Tajbakhsh, Sheila <sheila@rosenblumlawlv.com>
Sent: Friday, May 24, 2024 5:24 PM
To: Lisa Szyc <lisaszyc@backuslaw.com>
Cc: Ryon Collins <ryon@rosenblumlawlv.com>
Subject: Re: Fessler adv. Fessler- Financial Decree

Lisa- that was the WRONG version that was not the final one. Here is the right one that is the latest saved version

On Fri, May 24, 2024 at 2:03 PM Tajbakhsh, Sheila <sheila@rosenblumlawlv.com> wrote:

> Hi Lisa,

> Attached is the financial decree for the Fessler matter. I drafted it off the video. I have attached it in word format- if you need to make any changes please redline them. If you approve as is let me know and I will have Ryon send you a PDF version to sign. I figured this is easiest if you have any suggested changes.
>
> If you have any questions please let me know.
>
> Sheila
>
> --
>
> **Sheila Tajbakhsh, Esq. |** Senior Associate Attorney
> Rosenblum Allen Law Firm
> 376 East Warm Springs Road
> Suite 140
> Las Vegas, Nevada 89119
> Ph: (702) 433-2889
> E: Sheila@rosenblumlawlv.com
>
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--

Sheila Tajbakhsh, Esq. | Senior Associate Attorney
Rosenblum Allen Law Firm
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Suite 140
Las Vegas, Nevada 89119
Ph: (702) 433-2889
E: Sheila@rosenblumlawlv.com

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Aluna Fessler, Plaintiff	CASE NO: D-23-662572-D
vs.	DEPT. NO. Department A
Jason Fessler, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

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

Service Date: 6/11/2024

Rosenblum Law Offices	staff@rosenblumlawlv.com
B|B Clerk	rec@backuslaw.com
Alex Falconi	admin@ournevadajudges.com
Lisa Szyc	lisaszyc@backuslaw.com
Mia Alvarez	miaalvarez@backuslaw.com
Aluna Fessler	alunaperry@gmail.com
Liliana Pinto	lpinto@backuslaw.com

EXHIBIT C

EXHIBIT C

Electronically Filed
6/11/2024 1:57 PM
Steven D. Grierson
CLERK OF THE COURT

NED
ROSENBLUM ALLEN LAW FIRM
MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
SHEILA TAJBAKHSH, ESQ.
Nevada Bar No. 15343
376 Warm Springs Rd. Suite 140
Las Vegas, NV 89119
(702) 433-2889—Phone
(702) 425-9642—Fax
Email: staff@rosenblumlawlv.com
Attorney for Defendant

DISTRICT COURT—FAMILY DIVISION
CLARK COUNTY, NEVADA

ALUNA FESSLER,

Plaintiff,

vs.

JASON FESSLER,

Defendant.

Case No.: **D-23-662572-D**
Dept. No.: **A**

NOTICE OF ENTRY OF BIFURCATED DECREE OF DIVORCE

PLEASE TAKE NOTICE that the Bifurcated Decree of Divorce from May 2, 2024 Evidentiary Hearing was entered into the above captioned case on the 11th day of June 2024. A true and correct copy is attached hereto and made a part hereof.

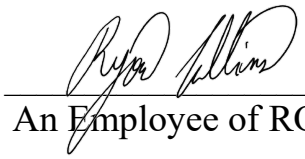
Dated this **Tuesday, June 11, 2024**

SHEILA TAJBAKHSH, ESQ.
Nevada Bar No. 15343
staff@rosenblumlawlv.com
Attorney for Defendant

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of ROSENBLUM ALLEN LAW FIRM and that on the 11th day of June, 2024, I served the above and foregoing **NOTICE OF ENTRY OF ORDER** on the following parties in compliance with the Nevada Electronic Filing and Conversion Rules NEFCR 9(d) through the Eighth Judicial District Court's e-Filing System (EFS):

Rosenblum Law Offices staff@rosenblumlawlv.com
B|B Clerk rec@backuslaw.com
Lisa Szyc lisaszyc@backuslaw.com
Mia Alvarez miaalvarez@backuslaw.com
Aluna Fessler alunaperry@gmail.com
Liliana Pinto lpinto@backuslaw.com



An Employee of ROSENBLUM ALLEN LAW FIRM

Electronically Filed
06/11/2024 1:27 PM
CLERK OF THE COURT

DECD
ROSENBLUM ALLEN LAW FIRM
MOLLY ROSENBLUM, ESQ.
Nevada Bar No. 08242
SHEILA TAJBAKHSH, ESQ.
Nevada Bar No. 15343
376 Warm Springs Road, Ste 140
Las Vegas, NV 89119
(702) 433-2889—Phone
(702) 425-9642—Fax
Email: staff@rosenblumlawlv.com
Attorney for Defendant

DISTRICT COURT—FAMILY DIVISION
CLARK COUNTY, NEVADA

ALUNA FESSLER, Plaintiff, **vs.** **JASON FESSLER,** Defendant.	Case No.: **D-23-662572-D** Dept. No.: **A**

BIFURCATED DECREE OF DIVORCE

This matter having come before the Court on April 19, 2024, for custody issues and May 2, 2024, for financial and other divorce related issues, for a non-jury trial on divorce and custody issues; and Defendant JASON FESSLER, present with his counsel, SHEILA TAJBAKHSH, ESQ. of the ROSENBLUM ALLEN LAW FIRM, and Plaintiff ALUNA FESSLER, present with her counsel LISA SYZC, ESQ., appearing pro bono. Also present were Our Nevada Judges.

Pursuant to NRS 125, the parties this matter to the Court for summary disposition on the issue of financials ONLY, not to include child support.

The parties were sworn and stipulated and agreed to the settlement terms for the financial portion of the divorce as follows:

THE COURT HEREBY FINDS that Plaintiff and Defendant are, have been and continue to be, for at least six (6) weeks prior to the commencement of this action, bona fide residents, physically present and domiciled in the State of Nevada.

THE COURT HEREBY FINDS that the parties were married on August 25, 2016, in Las Vegas, Nevada, and have ever since been husband and wife.

THE COURT HEREBY FINDS that since the marriage of the parties, they have become, and now are, incompatible, so as to render it impossible for them to continue as husband and wife and there is no possibility of reconciliation.

THE COURT HEREBY FINDS there is one (1) minor child born the issue of their marriage, to wit: to wit: Sterling Fessler, born on April 18, 2017 (6) (hereinafter "STERLING"). That there are no adopted children and to the best of Plaintiff's knowledge, she is not pregnant at this time.

THE COURT HEREBY FINDS that the Court will be issuing a written decision on the issue of custody, visitation, holiday schedules and child support.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND THEREFORE ORDERED, ADJUDGED, AND DECREED that the bonds of matrimony heretofore and now existing between Plaintiff and Defendant be, and the same are hereby wholly dissolved, and each of the parties hereto is hereby restored to the status of a single, unmarried person.

ASSET AND DEBT DISTRIBUTION

[Negotiations begin at VT 1:42:00]

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the martial residence, located at 5785 Holmby Avenue, Las Vegas, Nevada, shall be awarded to Defendant as his sole and separate property, subject to and encumbrance thereon.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant shall pay Plaintiff a total of $35,000.00 as and for Plaintiff's *Malmquist* share of the marital residence. That the payment shall be made to Plaintiff in full within seven (7) days of May 1, 2024. Plaintiff shall waive any and all remaining current and future interest in the Holmby residence.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff has been exclusively residing in the home since the inception of litigation. That the Plaintiff

shall vacate the residence no later than forty-five (45) days from May 1, 2024, at which time the residence will become Defendant's sole and separate property.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that prior to the Plaintiff vacating the residence, the Defendant shall be permitted to conduct a "walk through" of the home to ensure condition and check for necessary repairs. That the parties shall work with one another to facilitate a time for the Defendant to conduct the walk-though of the marital residence. Should the parties reach an impasse and be unable to facilitate the same, they will notify their respective counsel, who will work together to find a date and time for a walk-though to occur.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff shall be awarded the 2019 Lexus NX 350 as her sole and separate property, subject to and encumbrance thereon, indemnifying Defendant and holding him harmless.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff shall immediately assume the payments for the 2019 Lexus NX 350. That the Plaintiff shall have thirty (30) days from May 1, 2024, to begin the process to refinance the Lexus and remove Defendant's name from the loan and bring the registration on the vehicle current.

That the Plaintiff shall use a portion of the $35,000 received as and for her share of the marital residence in order to assist her in getting the Lexus refinanced and the registration current.

IT IS FURTHER STIPULATED AND AGRD AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant shall be awarded all other vehicles of the community, to include the dirt bike, the Rhino offroad vehicle, the Polaris RZR and the vehicle he is currently driving as his sole and separate property, subject to any encumbrance.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the parties have worked to create an A/B list for all additional property, furniture and furnishings inside the marital residence. That Plaintiff shall take the following as her sole and separate property free from claim from the Defendant:

a. The interior and exterior couches;
b. The 85-inch TV;
c. The mater bedroom set;
d. The spare bedroom set
e. The spare 55-inch TV;
f. Sterling's bedroom set;
g. The dining room table;
h. The MSI;
i. Two (2) Nespresso machines;
j. The chop saw;

k. Her wedding rings;

l. Any and all clothing, jewelry and personal effects.

That Defendant shall receive the following additional items as his sole and separate property, free from any claim by the Plaintiff:

a. His wedding rings;

b. The massive toolbox with tools;

c. The complete stereo system, speakers, subwoofer, etc.;

d. The work desk;

e. The HP laptop;

f. The appliances in the marital home (refrigerator, washer/dryer, dishwasher, microwave)

g. The gun safe;

h. The shed in the backyard;

i. The hunting tent and mount;

j. Hunting gear; and

k. Any and all clothing, jewelry and personal effects.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that any and all retirement accounts shall be divided pursuant to a QDRO and subject to the time rule. That the parties agree to split the cost of the QDRO preparation. The parties agree that the QDRO process will be started within 30 days and the loan taken out pre-

divorce by Jason will be assessed against his community property share per the previously entered stipulation.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that the parties have identified community debt on their most recently filed Financial Disclosure Forms filed with the court. That the Defendant's most recent FDF was filed on March 20, 2024. Plaintiff's most recent FDF was filed on February 12, 2023. Defendant shall take the debt identified on the FDFs as his sole and separate property, indemnifying Plaintiff and holding her harmless.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that all bank accounts in the parties' respective name will remain their sole and separate property.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that neither party shall be paid spousal support and/or alimony moving forward. That Plaintiff waives her right to an award of spousal support.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that on May 1, 2024, Defendant made the <u>final</u> payment of $6,000 for temporary family support which includes payment of the expenses of the marital residence through the month of May 2024.

As of the day of this hearing, Defendant will no longer make the family support payment which includes expenses on the marital residence, and Plaintiff will be responsible for payment of the expenses on the marital residence until she vacates the property. (VC at 01:47:02)

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant may retain the life insurance policy on behalf of Plaintiff if he chooses to do so.

MISCELLANEOUS PROVISIONS

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiff shall remove her name from the joint account at the Credit Union that Defendant has been paying for. That Plaintiff shall remove her name no later than May 15, 2024.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that Defendant shall release Plaintiff's phone number though T-Mobile no later than May 15, 2024 so that Plaintiff may assume her own phone plan.

IT IS FURTHER STIPULATED AND AGREED AND FURTHER ORDERED, ADJUDGED AND DECREED that each party will bear their own attorney's fees and costs. (VC at 01:45:40)

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff shall be restored to her maiden name and be known as ALUNA MERCY PARRY forward.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that the parties are placed in notice of the following:

> **Circular 230 Disclosure:** To ensure compliance with recently enacted U.S. Treasury Department Regulations, we are now required to advise you that, unless otherwise expressly indicated, any federal tax advice in this communication, including any attachments, is not intended or written to be used, and cannot be used, by anyone for the purpose of avoiding federal tax penalties that may be imposed by the federal government for promoting, marketing or recommending to another party any tax-related matters addressed herein.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that in the event any property has been omitted from this Decree that would have been community property or otherwise jointly-held property under the law applicable as of the date hereof, the concealing or possessory party will transfer or convey

to the other party, at the party's election(a) the full market value of the other party's interest on the date of this Decree, plus statutory interest through and including the date of transfer of conveyance; (b) the full market value of the party's interest at the time that party discovers that he or she has an interest in such property, plus statutory interest through and including the date of transfer of conveyance; or (c) an amount of the omitted property equal to the other party's interest therein, if it is reasonably susceptible to division.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that if any claim, action or proceeding is brought seeking to hold the one of the parties hereto liable on account of any debt, obligation, liability, act or omission assumed by the other party, the responsible party will, at his or her sole expense, defend the innocent party against any such claim or demand and he or she will indemnify, defend and hold harmless the innocent party.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that if any joint debt, obligation, liability, act or omission creating such liability has been omitted from the Decree and is subsequently discovered, either party may petition the Court for an allocation of that debt, obligation, liability, or liability arising from such act of omission.

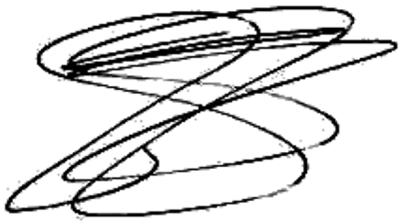
IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that except as otherwise specified herein, any and all property acquired, income received or liabilities incurred by either of the parties hereto from and after the date of entry of this Decree will be the sole and separate property of the one so acquiring the same, and each of the parties hereto respectively grants to the other al such future acquisitions of property as the sole and separate property of the one so acquiring the same and holds harmless and agree to indemnify the other party from any and all liabilities incurred.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that each party will execute all legal documents, certificates of title, bills, of sale, deeds or other evidence of transfer necessary to effectuate this Decree within five (5) days of the entry of this Decree. Should either party fail to execute any if said documents to transfer interest to the other, then it is agreed that this Decree will constitute a full transfer of the interest of one to the other, as herein provided, and it is further agreed the pursuant to NRCP 70, the Clerk of the Court will be deemed to have hereby been appointed and empowered to sign, on behalf of the non-signing party, any of the said documents of transfer which have not been executed by the party otherwise responsible for such.

IT IS FURTHER STIPULATED AND AGREED AND THEREFORE, FURTHER ORDERED, ADJUDGED AND DECREED that the parties waive their rights to a written notice of entry of decree or judgment, to request findings of fact and conclusions of law, to appeal, and to move for a trial on the issues of FINANCES only.

IT IS SO ORDERED.

Dated this 11th day of June, 2024



CD6 1A8 397B A141
Mari D. Parlade
District Court Judge

ROSENBLUM ALLEN LAW FIRM



SHEILA TAJBAKHSH, ESQ.
Nevada Bar No.15343
Rosenblum Allen Law Firm
376 East Warm Springs Rd. Ste. 140
Las Vegas, NV 89119
Attorney for Defendant

BACKUS BURDEN

LISA SZYC, ESQ.
Nevada Bar No. 11726
Backus Burden
3050 S. Durango Drive
Las Vegas, Nevada 89117
Attorney for Plaintiff

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Collins, Ryon <ryon@rosenblumlawlv.com>

Re: Fessler v. Fessler - Financial Decree

1 message

Tajbakhsh, Sheila <sheila@rosenblumlawlv.com> Thu, Jun 6, 2024 at 9:23 AM
To: Lisa Szyc <lisaszyc@backuslaw.com>
Cc: "Collins, Ryon" <ryon@rosenblumlawlv.com>, Liliana Pinto <lpinto@backuslaw.com>, Mia Alvarez <miaalvarez@backuslaw.com>, Reception <rec@backuslaw.com>

Lisa,

We AGREED the night we made the agreement that attorneys fees would be kept with the parties accruing them. You know it, I know it, and now you're making self serving arguments and trying to side step the agreement and candidly, the position is not well taken.

The reason it was stated my client would keep his fees is because your client had not paid a or accrued a DIME in fees and continues to enjoy that benefit,
It was stated CLEARLY on the record that the ONLY financial issue the Court is to decide is the issue or child support. The Court id well aware of this. Review the video. Interestingly, after all that, you still felt it was appropriate to file for attorneys fees!! We will NOT be changing the decree and you may submit your own competing decree. My client continues to accrue fees based upon the inaction and game playing of Aluna throughout litigation. Lastly there was no "tone" in Ryon's email. His tone has matched the exact posture that you and Ms. Cramer have had in ALL communications on this case.
Any and all emails can be directed at me in the future. Thank you,

Sheila Tajbakhsh, Esq. | Senior Associate Attorney
Rosenblum Allen Law Firm
376 East Warm Springs Road
Suite 140
Las Vegas, Nevada 89119
Ph: (702) 433-2889
E: Sheila@rosenblumlawlv.com

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On Thu, Jun 6, 2024 at 9:02 AM Lisa Szyc <lisaszyc@backuslaw.com> wrote:

> Ryon,
>
> First of all, please do not speak to me in such a rude tone. I have never addressed you in this manner. There have been several emails about this case, so I apologize for any confusion regarding my track changes on the incorrect version of the decree. Mind you, it was your office in which caused for more than one version to be generated initially.
>
> Secondly, although the parties agreed that Jason's last community property payment to Aluna would be in May, there was no express agreement on the record that Aluna would pay the expense as stated in your version of the decree, hence my proposed changes. I challenge you to provide a video citation proving otherwise.

Further, with respect to attorney fees, although Jason may have agreed to pay his own attorney fees, as is clearly indicated, and highlighted several times in my closing brief and throughout the video record during the trial, my client DID in fact make a request for *Sargeant* fees at the onset of the case. As you should be aware, this issue has never been ruled on; therefore, I cannot stipulate that each party pay their own fees and costs, not to mention said stipulation is not supported by the video record.

For these reasons, if you insist on submitting the aforementioned decree, I will have no choice but to address these concerns at today's hearing and submit a competing decree.

Lisa M. Szyc, Esq.

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3050 South Durango Drive

Las Vegas, Nevada 89117

(702) 872-5555

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From: Collins, Ryon <ryon@rosenblumlawlv.com>
Sent: Wednesday, June 5, 2024 1:01 PM
To: Liliana Pinto <lpinto@backuslaw.com>
Cc: Lisa Szyc <lisaszyc@backuslaw.com>; Reception <rec@backuslaw.com>; Mia Alvarez <miaalvarez@backuslaw.com>; Sheila Tajbakhsh <sheila@rosenblumlawlv.com>
Subject: Re: Fessler v. Fessler - Financial Decree

Good afternoon,

Please find attached the partially revised bifurcated decree of divorce. Please note that the revisions that your office made were on the wrong document despite the correct one being noted as received.

As to the question regarding payment of expenses of the marital residence, please see the video at approximately 1:47:02 through 1:47:27 in which it is stated that the May payment is our client's final payment. Regarding the revision to attorney fees, please see the video at 1:45:40 through 1:45:45 in which Sheila states "My client will keep his own attorney fees." Considering your client does not have any attorney's fees we feel this stipulation is accurate.

With the hearing scheduled for tomorrow please reply back by 3:30pm if you approve of the attached decree. If we do not hear back from you we will submit the decree and you are, of course, welcome to submit a competing decree pursuant to EDCR.

Thank you.

Best Regards,

Ryon Collins

Paralegal for Sheila Tajbakhsh, Esq.

Rosenblum Allen Law Firm

376 East Warm Springs Road, Suite 140

Las Vegas Nevada 89119

(702) 433-2889

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On Tue, Jun 4, 2024 at 3:24 PM Liliana Pinto <lpinto@backuslaw.com> wrote:

> Good afternoon,
>
> Please see the attached document with Ms. Szyc's edits to the Financial Decree in the above mentioned matter.
>
> Further, I would like to follow up on the status of the proposed order by Ms. Szyc following the hearing on May 2, 2024. Please advise with any suggestions or changes to be made to the order.
>
> Should you have any questions or concerns please feel free to reach out.

Best,

Liliana Pinto | Legal Assistant

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3050 South Durango Drive
Las Vegas, Nevada 89117
(702) 872 – 5555
(702) 872 – 5545 (f)

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From: Collins, Ryon <ryon@rosenblumlawlv.com>
Sent: Monday, June 3, 2024 3:23 PM
To: Lisa Szyc <lisaszyc@backuslaw.com>
Cc: Reception <rec@backuslaw.com>; Mia Alvarez <miaalvarez@backuslaw.com>; Liliana Pinto <lpinto@backuslaw.com>; Sheila Tajbakhsh <sheila@rosenblumlawlv.com>
Subject: Fessler v. Fessler - Financial Decree

Good afternoon Lisa,

Have you been able to review our decree regarding finances? This needs to be submitted as soon as possible considering the letter we received from the department. Thank you.

Best Regards,

Ryon Collins

Paralegal for Sheila Tajbakhsh, Esq.

Rosenblum Allen Law Firm

376 East Warm Springs Road, Suite 140

Las Vegas Nevada 89119

(702) 433-2889

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Protecting Rights. Improving Lives.

Collins, Ryon <ryon@rosenblumlawlv.com>

RE: Fessler adv. Fessler- Financial Decree

1 message

Lisa Szyc <lisaszyc@backuslaw.com> Fri, May 24, 2024 at 5:29 PM
To: "Tajbakhsh, Sheila" <sheila@rosenblumlawlv.com>
Cc: Ryon Collins <ryon@rosenblumlawlv.com>

Thank you and no worries, I have not opened the other one yet.

Lisa M. Szyc, Esq.

BACKUS | BURDEN

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From: Tajbakhsh, Sheila <sheila@rosenblumlawlv.com>
Sent: Friday, May 24, 2024 5:24 PM
To: Lisa Szyc <lisaszyc@backuslaw.com>
Cc: Ryon Collins <ryon@rosenblumlawlv.com>
Subject: Re: Fessler adv. Fessler- Financial Decree

Lisa- that was the WRONG version that was not the final one. Here is the right one that is the latest saved version

On Fri, May 24, 2024 at 2:03 PM Tajbakhsh, Sheila <sheila@rosenblumlawlv.com> wrote:

> Hi Lisa,

> Attached is the financial decree for the Fessler matter. I drafted it off the video. I have attached it in word format- if you need to make any changes please redline them. If you approve as is let me know and I will have Ryon send you a PDF version to sign. I figured this is easiest if you have any suggested changes.
>
> If you have any questions please let me know.
>
> Sheila
>
> --
>
> **Sheila Tajbakhsh, Esq. |** Senior Associate Attorney
> Rosenblum Allen Law Firm
> 376 East Warm Springs Road
> Suite 140
> Las Vegas, Nevada 89119
> Ph: (702) 433-2889
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>
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--

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DISTRICT COURT
CLARK COUNTY, NEVADA

Aluna Fessler, Plaintiff	CASE NO: D-23-662572-D
vs.	DEPT. NO. Department A
Jason Fessler, Defendant.	

AUTOMATED CERTIFICATE OF SERVICE

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

Service Date: 6/11/2024

Rosenblum Law Offices	staff@rosenblumlawlv.com
B|B Clerk	rec@backuslaw.com
Alex Falconi	admin@ournevadajudges.com
Lisa Szyc	lisaszyc@backuslaw.com
Mia Alvarez	miaalvarez@backuslaw.com
Aluna Fessler	alunaperry@gmail.com
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