

Code: 2605

Alexander M. Falconi

FILED

Appearing in Proper Person

BY

DEPUTY

IN THE FAMILY DIVISION
OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

ALEXANDER M. FALCONI,

Petitioner,

vs.

ANN

Respondent.

Case #: FV08-03200

Dept #: 11

CORRECTED NOTICE TO SET

To the Respondent, ANN

Pursuant to WDFCR 44(4)(b)¹, you are invited to appear at the office of the familya.m.², to confer with Petitioner and the family division clerk and schedule a hearing date.**AFFIRMATION³:** This document does not contain the social security number of any person.

DATED THIS 25 day of FEBRUARY, 2014.

Alexander M. Falconi

Pro Se

¹ WDFCR 44(4)(b): "Contested motions affecting child custody, including temporary custody, modification of custody and/or request to move out of state with children, shall be set for hearing. At the time of filing any motion affecting custody, the party filing it shall simultaneously file and serve a notice to appear and set the matter for hearing."

² WDFCR 44(2)(b): "Setting of cases shall be from 9:00 a.m. to 12:00 noon Tuesday through Thursday. All other calendaring shall be done by appointment."

³ This affirmation is in accordance with NRS 239B.030.

NRCP 5 CERTIFICATE OF SERVICE

I, Alexander Falconi, do hereby declare under penalty of perjury that I am over the age of 18 and not a party to this action and that I **personally**⁴ served a true and correct copy of this

Notice upon:

Katherine Berning, Esq.
[REDACTED]
[REDACTED]

SERVED THIS 25 day of FEBRUARY, 2014.



Alexander M. Falconi

⁴ WDCR 4(5) entitles you to 10-days notice. NRCP 6(e) does not apply as this notice was personally served.

ORIGINAL

Code: 2490
Alexander M. Falconi

Appearing in Proper Person

BY: IVC Cruz
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MOTION FOR LEAVE OF THE COURT ALLOWING LIMITED DISCOVERY

COMES NOW, Petitioner, Alexander M. Falconi, appearing in proper person, and hereby files a motion for leave of the court allowing limited discovery. This motion is based upon the following memorandum of points and authorities and all pleadings on file herein.

Memorandum of Points and Authorities

I. Summary

Parties share joint-physical and joint-legal custody over a common minor child of age seven (7). NRCP 16.21 requires that a party seek leave of the court to conduct post-judgment discovery. Petitioner, Alexander M. Falconi ('FATHER') has filed a *Motion to Modify Child Custody* in large part due to Respondent, Ann (MOTHER'), dental and educational neglect. There have also been three (3) reports to Child Protective Services against MOTHER that FATHER has only recently become aware of during a meeting with the child's teacher, Mrs. Williams, who reported notifying Child Protective Services ('CPS') herself. The