

----- Original Message -----

From: Norman, Judy

To: T & M Land ; mommchis@aim.com

Sent: Monday, January 14, 2008 6:07 PM

Subject: Response to Manoukian

Dear Judge Manoukian,

You indicate in your e-mail that I was "cool" to the idea of Dr. Holland. As you will recall, I was absolutely adamant that she not be involved in this case and recommended that you contact the local Domestic Court to receive a name or names of counselors that have no involvement up to date in this case. Dr. Holland was clearly an ally of Terry's throughout the entire matter. After counseling had begun, she accepted a second large submittal of documents that Terry had clearly selected (cherry picked) which supported her case. This was done without my knowledge or opportunity to counter in any way. I only learned of it when Dr. Holland added approximately \$800.00 to my bill for the time she had expended in reviewing Terry's documents.

In the doctors final order (as I recall at approximately \$300.00 per page), she acknowledges that she was not called upon by the Court to render a decision as to the "custody matter". But, she could not resist on numerous occasions in her report indicating that she favored Terry having custody of Michael.

As a final indignity, she would not relinquish her report to me without receiving, as I recall, a Cashier's Check or Money Order. This was made known to me on the very eve of the hearing in which a report was needed. I had to leave the courthouse in the middle of trial to go to a bank and secure the proper payment, this notwithstanding the fact that her report was Court Ordered and certainly could have been ordered paid, if either party was delinquent.

I had resolved that I would go to the State Medical Board and file the complaint based on the above, but frankly did not have the time to do so. I am adamantly opposed to Dr. Holland's involvement with Michael.

Sincerely,

Donald M. Mosley

Carl E. Lovell, Jr.

Esquire

ATTORNEY-AT-LAW

2801 S. VALLEY VIEW BLVD.
SUITE 1-B
LAS VEGAS, NV 89102
OFFICE (702) 362-7922
FAX (702) 362-8029

September 15, 1999

~~SENT VIA FAX & U.S. MAIL~~
~~386-8820~~

Randall Roske, Esq.
511 S. Tonopah Dr.
Las Vegas, Nevada 89106

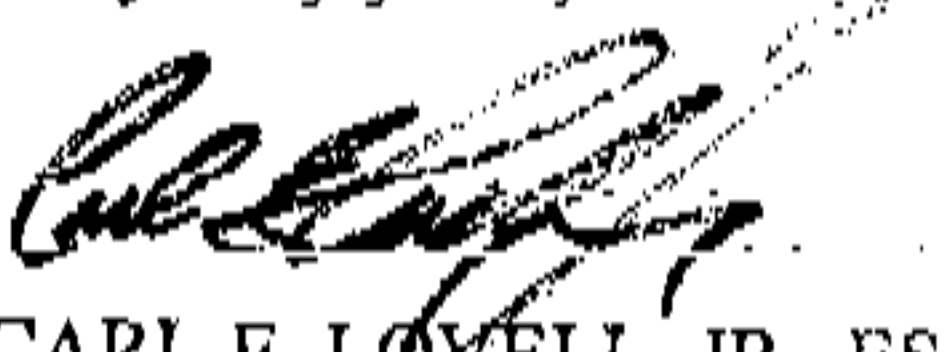
Re: Mosley vs. Figliuzzi

Dear Mr. Roske,

Once again, at the behest of my client Donald Mosley, I am contacting you in an effort to persuade your client to resolve the differences between the parents of Michael Mosley and establish a more normal child rearing environment. As stated previously, it is my client's desire that Terry seek psychological help in overcoming her anger, enabling her to be a stable and constructive influence in Michael's life. Specifically what is suggested is that the two parties agree upon a psychologist or psychiatrist to meet with both and discuss the problem from each standpoint. Thereafter, Terry would undergo counseling with an eye toward eliminating the hostility which is detrimental to the parties' child. Upon successful completion of counseling a more balanced custody arrangement could be established, for the good of all.

Please discuss this suggestion with your client and inform me of her thoughts in the matter. Judge Mosley and I would be happy to arrange a meeting to further explore these possibilities.

Very truly yours,


CARL E. LOVELL, JR., ESQ.

P.S. Please remind your client that the proper telephone number to use to contact Michael is 878-0621.

CELL/tlk

cc: Donald M. Mosley

5/16 P.

RANDALL J. ROSKE

Attorney At Law

511 South Tonopah Drive, Las Vegas, Nevada 89106-4026

(702) 386-0313 ■ Fax 386-8820

September 30, 1999

Carl E. Lovell, Jr., Esquire
2801 South Valley View Boulevard, Suite 1B
Las Vegas, NV 89102

Re: Mosley v. Mosley, case number T 33399/D 149228

Dear Mr. Lovell:

I find myself yet again responding to a letter which attempts to place all blame at the feet of my client, Terry Mosley (please see your letter dated September 15, 1999). In your letter you demand that "Terry seek psychological help in overcoming her anger." Perhaps it would be well served to fully review the history of the parties before placing a label on anyone. I have compiled a series of questions that address the anger issue:

1. Did either party, in an act of road rage, beat up a motorist near Ely, Nevada in 1990;
2. Did either party commit an act of domestic violence upon the other while the parties lived together;
3. ~~Did either party~~ Did either party get viciously kicked in the leg by the other's cowboy boot in 1993; (LVMPD Event No. 930509-1633, P 3677);
4. Did either party admit under oath to whipping the minor child with a quirt or riding crop since he was three years old;
5. Which parent did the minor child identify as the person who caused the bruises on his backside to two different doctors.

If your answer to each of the foregoing questions was Donald Mosley, then you have correctly identified the person with an anger management problem.

If you are interested in solving a major parental alienation issue, you can advise Mr. Mosley to have Michael call his mother every night (at the number Michael knows) at 7 p.m. Having Michael call his mother alleviates my client's need to speak with your client about why she has not had any visitation, telephonic or otherwise with Michael. This does not create a

Exb Q2

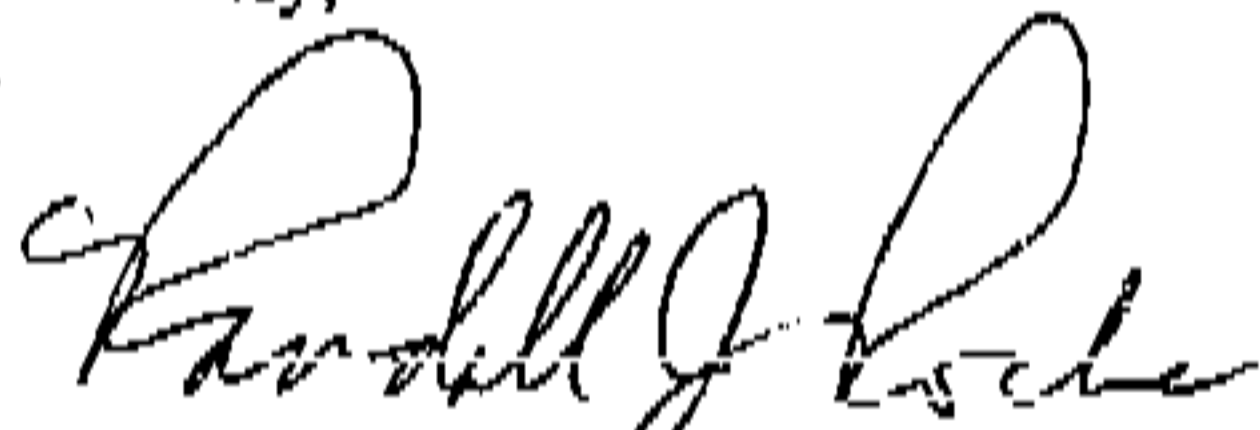
Carl E. Lovell, Esquire
September 30, 1999
Page 2

negative situation where your client has to play the control freak by hanging up on Terry, telling her to call on the "other line" (only to find the other line busy or unanswered). By having Michael call his mother at 7 p.m. each night, he will not witness Donald Mosley calling Michael's mother names, exhibiting anger toward her and hanging up on her. Let us begin the 7 p.m. phone calls today.

Mr. Mosley's refusal to grant regular visitation of the minor child (physical and telephonic) reflects that he is the least likely parent to grant the noncustodial parent an ongoing relationship with the minor child (please see Mosley v Figliuzzi, 113 Nev.1).

My client needs to see Michael (Mr. Mosley has not been permitted to speak to Michael for over a month). Please speak with Mr. Mosley about arranging visitation ASAP.

Sincerely,



Randall J. Roske, Esquire

hb

cc: Terry Mosley

Honorable Mario Recanzano

FROM : T. MOSLEY
T#110

PHONE NO. :

Oct. 29 2001 05:14PM P2

CASE PROCEEDINGS LIST

8/29/96 PAGE 1

CASE #: 90-00125

DATE FILED:

DATE OCCURRED: 10/31/90

COMPLAINT AGENCY: SO

OFFICER: CANDELAS

TICKET #: 0008547

DEFENDANT ATTORNEY:

PLAINTIFF ATTORNEY:

REMARKS: NOT GUILTY PLEA BY PHONE HEARING DATE SET FOR
12/21/90 AT 1:30 P.M. (455-4304)

DEFENDANTS:

MOSLEY, DONALD M.

CHARGES: NRS-200.481 BATTERY, DEFINITIONS AND PENALTIES

PROCEEDINGS:

- 11/21/90 THE DEFENDANT PHONED STATING HE WOULD LIKE TO PLEA NOT GUILTY PER PHONE AND SET A HEARING DATE AT THIS TIME FOR DEC. 21ST AT 1:30 PM. HE ALSO STATED HE WOULD LIKE TO HAVE A COURT REPORTER PRESENT AT THE HEARING. I GAVE HIM SNUFFYS PHONE NUMBER AND ALSO ADVISED I WOULD TRY TO GET THE MESSAGE TO HER HE LEFT HIS NUMBER FOR HER TO CALL.
- 11/21/90 ORDER SETTING MISD. TRIAL BEFORE THE COURT FILED THIS DATE.
- 12/07/90 SUBPOENA RETURNED SHOWING SERVICE FILED THIS DATE.
- 12/21/90 NOTICE OF MOTION, AFFIDAVIT IN SUPPORT OF MOTION TO CONTINUE HEARING AND MOTION TO CONTINUE HEARING FILED THIS DATE.
- 6/04/91 RE-SET MISDEMEANOR TRIAL BEFORE THE COURT FILED THIS DATE 07/10/91 AT 10:00 A.M.
- 6/11/91 A MISDEMEANOR COMPLAINT UNDER OATH HAVING BEEN PLACED BEFORE ME THIS DATE BY SHERIFF BERNIE ROMERO CHARGING BATTERY (SIMPLE) AND ACCUSING DONALD M. MOSLEY THEREOF. COMPLAINT AND AFFIDAVIT FOR WARRANT OF ARREST WERE FILED THIS DATE AND THE WARRANT OF ARREST WAS ISSUED.
- 6/13/91 SUBPOENAS FOR TIM LUJAN AND STEVE CANDELAS WERE RETURNED AND FILED SHOWING SERVICE.
- 7/18/91 MOTION AND ORDER FOR DISMISSAL FILED THIS DATE.

ELY JUSTICE COURT
POST OFFICE BOX 178
ELY, NEVADA 89301
TELEPHONE (702) 289-2678

RECEIPT NO. 014933

DATE 08/29/96
CASE NAME FLANGAS, ERNIE
CASE NUMBER -00000

PAYOR	REFERENCE	PREVIOUS BALANCE	AMOUNT PAID	BALANCE	NEXT PAYMENT DUE
FLANGAS, ERNIE	SEARCH FE		4.30	0.00	

PAYMENT TYPE	BATCH DATE	BATCH SEQ. NO.
CASH	8/27/96	026

By *JL*