

COMMISSION ON JUDICIAL SELECTION APPLICATION

EIGHTH JUDICIAL DISTRICT COURT
DEPARTMENT O

Replace the highlighted spaces on this page with the vacancy you seek to fill.

VII, XXIX, C or N

Candidates may only choose one department.

By

Regina M McConnell, Esq



Personal Information

1.	Full Name	
2.	Have you ever used or been known by any other legal name (including a maiden name)? If so, state name and reason for the name change and years used.	Yes. I was Regina Clark for 29 years before getting married and taking my husband's last name in 2003.
3.	How long have you been a continuous resident of Nevada?	20 years
4.	City and county of residence	Henderson, Clark County
5.	Age	49

Employment History

6. Please start with your current employment or most recent employment, self-employment, and periods of unemployment for the last 20 years preceding the filing of this Application.

Current or Last Employer	McConnell Law, Ltd
Phone	702-487-3100
Physical Address & Website	9017 S Pecos Rd, Suite 4445, Henderson, Nevada 89074 www.MLVegas.com
Date(s) of Employment	October 2014 - Present
Supervisor's Name and Title	Myself
Your Title	Owner
Describe Your Key Duties	My duty is to guide my clients through their case in the most efficient and effective manner possible and to provide them with the best possible outcome for their case. I handle all aspects of the case from intake to motion practice, negotiations, settlement and/or trial. As a solo attorney, I also manage the business aspects of my firm including marketing, management, and firm procedures.
Reason for Leaving	N/A

Former Employer	McDonald Law Offices, PLLC
Phone	N/A – no longer in business
Physical Address & Website	2451 Horizon Ridge Pkwy, Suite 120, Henderson, NV 89052 (Last known address) N/A – no longer in business
Date(s) of Employment	October 2012 - October 2014
Supervisor's Name and Title	Brandon B. McDonald, Esq., Owner
Your Title	Of Counsel

Describe Your Key Duties	I was primarily an advisor to Brandon after he purchased the firm assisting him with more complicated cases as he was new to family law. I also handled a limited caseload of my own (typically for previous clients that needed additional services).
Reason for Leaving	After being "Of Counsel" for a couple of years and once my kids were a little older, I wanted to own my own firm again

Former Employer	McConnell Law Group, LLC
Phone	702-897-2829
Physical Address & Website	2850 W Horizon Ridge Pkwy, Ste 200, Henderson, Nevada 89052 www.mlglawyer.com (no longer active)
Date(s) of Employment	December 2007 - October 2012
Supervisor's Name and Title	Myself
Your Title	Owner
Describe Your Key Duties	My duty was to guide my clients through their case in the most efficient and effective manner possible and to provide them with the best possible outcome for their case. I handled all aspects of the case from intake to motion practice, negotiations, settlement and/or trial. I also oversaw the work of my associate attorneys who each had their own caseload. I provided guidance and direction to each of them so that all clients of the firm were represented well. Finally, I managed the business aspects of my firm including marketing, management, and firm procedures.
Reason for Leaving	After giving birth to my third child and with two other babies still at home, I wanted to spend more time with them. I was able to sell my firm to Brandon McDonald, Esq., a new family law attorney. I became "Of Counsel" with his firm which allowed me to work part-time for a few years while my children were young.

Former Employer	Kravitz, Schnitzer, Sloane, Johnson & Eberhardy, Chtd.
Phone	702-362-6666
Address & Website	8985 S Eastern Ave, Ste 200, Las Vegas, Nevada 89123 www.ksjattorneys.com
Date(s) of Employment	January 2003 – December 2007
Supervisor's Name and Title	Martin J. Kravitz, Esq. Senior Partner
Your Title	Associate Attorney / Junior Partner
Describe Your Key Duties	My duties included drafting motions, drafting written discovery, preparing for, attending, and taking depositions, attending hearings and arguing motions. I was also responsible for assisting senior partners/partners with any trial work and

	appellate work along with preparing for and handling my own cases all the way through jury trial.
Reason for Leaving	I started my own firm pursuing family law cases.

Educational Background

7. List names and addresses of high schools, colleges and graduate schools (other than law school) attended; dates of attendance; certificates or degrees awarded; reason for leaving.

Yorktown High School
 1100 S. Tiger Drive, Yorktown, IN 47396
 August 1988 – May 1992
 High School Diploma

Indiana University
 107 S Indiana Avenue, Bloomington, IN 47405
 August 1992 – August 1995

Indiana Business College
 2222 Poshard Drive, Columbus, IN 47203
 September 1995 – December 1996
 Associates of Applied Science Degree

Indiana University East (IU East)
 2325 Chester Boulevard, Richmond, IN 47374
 June 1997 – May 1999
 Bachelor of Science in Business Administration Degree with a Major in Management and a Minor in Economics

8. Describe significant high school and college activities including extracurricular activities, positions of leadership, special projects that contributed to the learning experience.

High School

- Marching Band, Concert Band & Pep Band 9th – 12th grade;
- Student Band Representative 9th – 11th grade; Librarian 10th grade; Vice President 12th grade;
- Winter Color Guard 9th – 11th grade;
- Cadet Teacher for second graders during my senior year. I would spend 1 hour each day assisting the kids with their assignments, teaching the class or reading to the class;
- Cross Country Team 9th – 10th grade;
- Drama Club 9th – 11th grade;
- Spanish Club 9th – 12th grade;
- Team Manager for boys' track team 11th – 12th grade; and
- Student Council Member 10 – 12th grade; Secretary during 12th grade.

Undergraduate

- **Student Alumni Council Ambassador, Indiana University East.** The mission of the SAC Ambassador was to strengthen community relations as we were among the most visible student leaders on campus, and we were student recruiters off campus. We interacted with the Chancellor and other members of the administrative team and served as hosts to visiting VIP's at major public relations events.
 - **Phi Beta Lambda Business Fraternity – Vice President.** The purpose of the fraternity was to help students develop vocational competencies for business and office occupations and promote a sense of civic and personal responsibility. The major goal of the fraternity was to develop competent and aggressive business leadership and help develop character for useful citizenship.
 - **Intern, Economic Development Corporation of Wayne County.** I was involved in assisting the organization with research and tasks that would assist local businesses with incentives, programs and services that were available to them and research ways to incentivize economic development projects.
9. List names and addresses of law schools attended; degree and date awarded; your rank in your graduating class; if more than one law school attended, explain reason for change.



Indiana University McKinney School of Law
 530 W New York Street, Indianapolis, IN 46202
 Juris Doctorate Degree, May 2002
 There was no rank provided on my transcript.

10. Indicate whether you were employed during law school, whether the employment was full-time or part-time, the nature of your employment, the name(s) of your employer(s), and dates of employment.

- **Intern, State of Indiana Department of Administration, Procurement Division.** I was selected to participate in the Governor's 2000 Public Service Summer Internship Program as an intern where I was tasked with assisting the Procurement Division with implementation of the "Greening the Government" program and assisting the Oversight Section by interacting with other state agencies during the streamlining process. I assisted in preparing the annual report on the purchase and use of recycled content and environmentally preferable products to the Legislature. It was a full-time summer position from May 2000 – August 2000.
- **Law Clerk, CMG Worldwide, Inc.** Founder, Attorney, and IU School of Law Graduate Mark Roesler is widely credited as an industry expert in celebrity valuations and the most experienced marketing and management expert for celebrities. CMG provides licensing for celebrity endorsements and usage rights. Clerking for this company during law school was a very coveted position. As a law clerk, I was

responsible for researching and investigating infringements of our clients' rights of publicity and then facilitating and reviewing settlement negotiations with the infringer and drafting agreements. I was able to work with CMG until I graduated Law School and moved to Las Vegas. May 2001 – May 2002.

11. Describe significant law school activities including offices held, other leadership positions, clinics participated in, and extracurricular activities.

- **Vice President, Amnesty International**, Indiana University Student Chapter.
- **Member, Phi Delta Phi** (an international legal honor society).
- **Student Member**, Clark County & American Bar Associations.
- **Member**, Sports and Entertainment Law Society.
- **Member**, Indiana International and Comparative Law Review.
- **Member**, Intramural Moot Court Competition.
- **Volunteer, Income Tax Assistance Program** preparing income tax returns for the elderly and disadvantaged residents of the Indianapolis area.
- **Volunteer, Reach for Youth Teen Court Diversion Program**. As a mentor for student attorneys in a juvenile justice diversion program. This program would meet approximately once a month and I would mentor the student attorney tasked with defending or prosecuting the teen who was responsible for either a school violation or a minor criminal infraction in the community.
- **Volunteer, Protective Order Pro Bono Project**. As a volunteer legal representative for victims of domestic violence. I would meet with victims that were unable to obtain personal representation due to limited financial means and assist them during the process of obtaining a protective order against their perpetrator.
- **Intern, State of Indiana Office of Public Access Counselor**. Law & State Government Internship program where I was placed as an intern tasked with researching and knowing the statutes and law as it related to the open records law. I was required to write memos to the Counselor regarding violations of the open records law.

Law Practice

12. State the year you were admitted to the Nevada Bar.

2002

13. Name states (other than Nevada) where you are or were admitted to practice law and your year of admission.

In 2013, my husband and I considered moving back to Indiana to be closer to our aging parents. I applied for and was granted conditional admission to the State Bar of Indiana; however, we decided that Nevada was home and did not move. Because I never practiced in Indiana, my membership was allowed to expire without becoming permanent.

14. Have you ever been suspended, disbarred, or voluntarily resigned from the practice of law in Nevada or any other state? If so, describe the circumstance, dates, and locations.

Yes, as stated in #13 above, in 2013 I was granted a conditional license in Indiana. However, it required me to practice law primarily in Indiana for the next 5 years in order to become a permanent member. My family and I never moved to Indiana, nor did I ever practice there, so the temporary license was allowed to terminate.

15. Estimate what percentage of your work over the last five years has involved litigation matters, distinguishing between trial and appellate courts. For judges, answer questions 16-20 for the five years directly preceding your appointment or election to the bench.

90% of my work over the last five years has involved litigation matters in the family trial court area. I have not had any appellate work over the last five years, but I did earlier in my career.

16. Estimate percentage of time spent on:

Legal Discipline	Percentage of Practice
Domestic/family	60%
Juvenile matters	30%
Trial court civil	
Appellate civil	
Trial court criminal	
Appellate criminal	
Administrative litigation	
Other: Please describe Trusts & Estate Planning	10%

17. In the past five years, what percentage of your litigation matters involved cases set for jury trials vs. non-jury trials?

100% were non-jury trials.

18. Give the approximate number of jury cases tried to a conclusion during the past five years with you as lead counsel. Give the approximate number of non-jury cases tried to a decision in the same period.

0 jury cases in the past 5 years, although I have tried several previous jury trials.
Approximately 5 non-jury trials in the past 5 years and I have tried many others previously.

19. List courts and counties in any state where you have practiced in the past five years.

Nevada Eighth Judicial District Court, Clark County
Las Vegas Justice & Municipal Courts, Clark County
Henderson Justice & Municipal Courts, Clark County

20. List by case name and date the five cases of most significance to you (not including cases pending in which you have been involved), complete the following tables:

Case 1
Case name and date: <u>Burnes v Gronda; Approximately 2005</u>
Court and presiding judge and all counsel: <u>5th Judicial District Court, Dept 2, Honorable Judge Robert W. Lane</u> <u>Plaintiff's Counsel: Gregory Heritage</u> <u>Defendant's Counsel: Jane Eberhardy & Regina M McConnell</u>
Importance of the case to you and the case's impact on you: <u>This was my first jury trial and it had an impact on me as it related to jury trial preparation. The jury was provided with questionnaires to evaluate the attorneys and the Judge at the conclusion of the trial. By reviewing the evaluations that were provided to us, I learned how personable the juries want the attorneys to be and I also learned that they like for us to keep our questions and arguments concise. Since then, I have applied this concept in all of my legal writings and arguments.</u>
Your role in the case: <u>Co-Counsel for Defendant</u>

Case 2
Case name and date: <u>Schuerger v JGL, Inc dba Salon 2000, Spoaks, LLC; 2003</u>
Court and presiding judge and all counsel: <u>8th Judicial District Court, Dept. 16, Honorable Judge Timothy C. Williams</u> <u>Plaintiff's Counsel: G. Dallas Horton & Valarie I. Fuji</u> <u>Defendants' Counsel: Regina M McConnell & Winston Bowman</u>
Importance of the case to you and the case's impact on you: <u>This was my first jury trial as first chair and I had spent a significant amount of time in the discovery process with depositions of medical providers and obtaining and reviewing in depth all of Plaintiff's medical records. During direct examination by Opposing Counsel of one of the treating physicians, a notation about one of the records was blown up for the jury to see. The doctor then testified that the medical record showed the Plaintiff suffered a significant injury.</u>
<u>When that record was pulled up for the jury, it did not look right to me. As a result, I looked through the same medical records that I had obtained through a subpoena and noticed that</u>

<p>the record had been altered sometime between my subpoena and the trial, and that the altered version which made the injury look more substantial than had originally been recorded was being put in front of the jury. I objected and informed the Court. The court then informed the jury to disregard and allowed me to put the Doctor back on the stand whereupon he was forced to testify that the record had been altered. This admission was a significant “win” for our defense as it helped the jury see that the injury may not have been as bad as it was originally argued. I learned how critical trial preparation is before entering the Courtroom. Being prepared and reviewing all of the details made a significant difference in the outcome of that trial, and that preparation has been a hallmark of my advocacy ever since.</p>
<p>Your role in the case: Lead Counsel for Defendants</p>

<p>Case 3</p>
<p>Case name and date: Rodriguez v The Primadonna Company, LLC; 2007</p>
<p>Court and presiding judge and all counsel: Supreme Court of Nevada, Honorable Justices Hardesty, Parraguirre and Douglas Appellant/Cross-Respondent Counsel: White, Meany & Weatherall, LLP and Peter C. Wetherall Respondent/Cross-Appellant Counsel: Kravitz, Schnitzer, Sloane, Johnson & Eberhardy, Chtd. And Martin J. Kravitz, Reina M McConnell and Gina M Mushmeche-Buras</p>
<p>Importance of the case to you and the case’s impact on you: This was an appeal filed by the Plaintiff in the underlying case when the Plaintiff lost on a summary judgment motion filed by our firm. This case was impactful because it involved the death of a teenager who was with his adult step-uncles at a casino and they were asked to leave after an evening of drinking and disorderly conduct. After leaving, the driver of the vehicle rolled the car and the teenager died. It was impactful because even though we were dealing with the death of a teenager, which was very sad, we had to stay focused on the law at hand, which did not allow for the casino to be held liable because there are no dram shop laws in Nevada.</p>
<p>Your role in the case: I provided research and trial preparation in the underlying District Court case and I researched and drafted the Answering Brief.</p>

<p>Case 4</p>
<p>Case name and date: Hernandez v Hernandez; 2018</p>
<p>Court and presiding judge and all counsel: 8th Judicial District Court, Dept G, Honorable Judge Rhonda K. Forsberg Plaintiff’s Counsel: Jennifer Gastelum; Dennis Leavitt & Benjamin Leavitt were substituted in after the Settlement Conference Defendant’s Counsel: Regina M McConnell</p>
<p>Importance of the case to you and the case’s impact on you: This is a case that went to a Judicial Settlement Conference and after several hours of negotiations, the parties came to a global resolution. The Plaintiff was Spanish speaking and used her attorney as an interpreter throughout the settlement negotiations. Both parties were then sworn in to put the terms on the record. Plaintiff’s counsel continued to interpret the agreement for the Plaintiff as I stated the terms of the agreement. Both parties were then canvassed and stated on the record that they understood the terms of the agreement, they were not coerced, and that they did agree to the terms as stated. Approximately 9 days later, Plaintiff substituted in new counsel who would not sign the Stipulated Decree of Divorce. The Court then set a non-jury trial</p>

but did not open discovery and the parties ultimately settled after a few hours of trial. This case made an impact on me as it showed that while the parties did agree, we, as the defense, should have insisted that an interpreter was present instead of using the Plaintiff's attorney. Even though they had not requested one be present, a neutral interpreter would have confirmed that the plaintiff was receiving a correct version and understanding of the settlement.
Your role in the case: Defendant's Counsel

Case 5
Case name and date: Generally, all of my adoption cases – 2017 - present
Court and presiding judge and all counsel: 8 th Judicial District Court Petitioners' Counsel: Regina M McConnell
Importance of the case to you and the case's impact on you: In September of 2021, Clark County reported a total of 3,069 children in their care during the previous year. These kids have been removed from their households due to abandonment, maltreatment, drug abuse, sexual abuse, etc. Finding them a permanent, loving home is in the interest of the kids, and our community at large. It is my absolute pleasure to have helped the State move over 800 of these kids from the system into a permanent home. The excitement on the day that a foster family becomes a forever family is something that I delight in every time we get one of these kids adopted. Honestly, I am particularly happy to be in consideration for Dept. O since I regularly appear in this Courtroom due to its large juvenile caseload. I have dedicated a significant portion of my practice and my personal time to helping kids have better lives and it would be my honor to serve the children and families that appear there each day.
Your role in the case: Counsel for the Adopting Parents

21. Do you now serve, or have you previously served as a mediator, an arbitrator, a part-time or full-time judicial officer, or a quasi-judicial officer? To the extent possible, explain each experience.

No

22. Describe any pro bono or public interest work as an attorney.

- **CAP (Child Advocate Program) Attorney, Legal Aid Center of Southern Nevada.** Over the last four years, I have dedicated a significant portion of my practice to DFS adoption cases helping over 800 foster children get adopted. These cases are all done on a small flat fee. Additionally, I have offered many free family law consultations to people who are on a limited budget and unable to obtain representation.

23. List all bar associations and professional societies of which you are or have been a member. Give titles and dates of offices held. List chairs or committees in such groups you believe to be of significance. Exclude information regarding your political affiliation.

- **Nevada Bar Association – 2002 – present**
- **American Bar Association – 2002 – present**
- **Business Network International, 2009-2012, 2015-present; President 2021- 2022**

- **American Inn of Courts, prior member**
- **Southern Nevada Association of Women Attorneys, prior member**
- **Clark County Bar Association, prior member**
- **Defense Research Institute, prior member**

24. List all courses, seminars, or institutes you have attended relating to continuing legal education during the past five years. Are you in compliance with the continuing legal education requirements applicable to you as a lawyer or judge?

I am compliant with the continuing legal education requirements and below is a chart of all classes taken since 2017.

Date	Course Name	Provider	General	Ethics	AAMH
12/20/2022	Chronic Stress and the Practice of Law	State Bar of Nevada	0	0	1
8/18/2022	Bench Bar	EJDC, Family Div	0.5	0	0
12/9/2021	Business Law Summit 2021	WealthCounsel, LLC	4.5	1	0
12/8/2021	Ethics Year in Review 2021	State Bar of Nevada	0	2	1
12/2/2021	EP101: RLT Drafting Intensive	WealthCounsel, LLC	11.5	0	0
9/9/2021	EP101: RLT Drafting Intensive	WealthCounsel, LLC	11.5	0	0
12/7/2020	The Brain Disease of Addiction	State Bar of Nevada	0	0	1
12/11/2019	Ethics Year in Review	State Bar of Nevada	0	2	1
12/5/2019	Advanced Family Law	State Bar of Nevada	5.5	1	0
12/10/2018	To Report or Not to Report Is Not the Question...	State Bar of Nevada	0	0	1
5/22/2018	Probate Hands-On!- An Interactive Workshop	NBI	10	1	0
5/1/2017	Complex Assets in Divorce	NBI	11	4	0

25. Do you have Professional Liability Insurance or do you work for a governmental agency?

Yes, I do maintain professional liability insurance.

Business & Occupational Experience

26. Have you ever been engaged in any occupation, business, or profession other than a judicial officer or the practice of law? If yes, please list, including the dates of your involvement with the occupation, business, or profession.

- **Cashier & Front Lanes Supervisor, Target Stores, November 1993 – January 1996**
- **Receptionist, Indiana Business College, Evening receptionist while attending school; January 1996 – December 1996**
- **Sales Assistant, J.J.B. Hilliard, W.L. Lyons, Inc., January 1997 – May 1997**

- **Customer Service Associate, Bank One – July 1997 – July 1999**

27. Do you currently serve or have you in the past served as a manager, officer, or director of any business enterprise, including a law practice? If so, please provide details as to:
- a. the nature of the business
 - b. the nature of your duties
 - c. the extent of your involvement in the administration or management of the business
 - d. the terms of your service
 - e. the percentage of your ownership

McConnell Law, Ltd. – Law Office

Client representation and Management of Firm

I am solely responsible for the management of the firm.

2014 – Present

100% Ownership

McConnell Law Group , Ltd.– Law Office

Client representation and Management of Firm

I was solely responsible for the management of the firm.

2007 – 2012

100% Ownership

28. List experience as an executor, trustee, or in any other fiduciary capacity. Give name, address, position title, nature of your duties, terms of service and, if any, the percentage of your ownership.

Co-Trustee of our personal family trust.

Civic Professional & Community Involvement

29. Have you ever held an elective or appointive public office in this or any other state?

No

Have you been a candidate for such an office?

Yes

If so, give details, including the offices involved, whether initially appointed or elected, and the length of service. Exclude political affiliation.

- Family Court Dept. S – 2020 (not elected)
- Henderson Municipal Court, Dept. 1 – 2016 (not elected)

30. State significant activities in which you have taken part, giving dates and offices or leadership positions.

- **2022 Gold Level Sponsor, Hope for Kids Christmas Drive Through Experience** where needy families drive through an amazing Christmas experience filled with lights,

music, and even snow. Approximately 1,500 families were pre-registered and as they drove through the experience, we filled their cars with appropriately sized clothing, coats & PJ's, food, hygiene products, and toys for the children in hopes of brightening their holidays. The experience was televised by Channel 13 and widely supported by the community.

- **Volunteer Clark County Bar Association Moot Court Competition.** I mentored the law students helping them hone their arguments and presentation skills during the mock court proceedings and trials.
- **Business Network International, 2009-2012, 2015-present; President 2021- 2022**
- **2009 to Present, Volunteer, Central Church.** Throughout my years of membership, I have been involved in several different roles. I started as a room leader in 2009 until I was asked to move up to be a service coach for the junior high team to mentor those kids in 2014. During the summers of 2018 and 2019, I was a mentor to High School leaders who each had a group of 4th and 5th graders attending church camp for a week in Arizona. I was the location administrator during several "Insomnia" overnight events that our church hosted for junior high kids. I typically oversaw the Circus Circus Adventuredome location making sure all of the kids were safe, accounted for, and having fun.

31. Describe any courses taught at law schools or continuing education programs. Describe any lectures delivered at bar association conferences.

I was an instructor at the following continuing legal education seminars.

- Skip Tracing in Nevada (2005) – NBI Seminar
- Insurance Coverage Trends (2006) – NBI Seminar
- Collection Law from Start to Finish (2007) – NBI Seminar
- Handling the Auto Injury Claim (2008) – NBI Seminar
- Commercial Leases (2008) – State Bar of Nevada Seminar
- Family Law: What to do When...? (2016) – NBI Seminar
- Complex Assets in Divorce (2017) – NBI Seminar

32. List educational, military service, service to your country, charitable, fraternal and church activities you deem significant. Indicate leadership positions.

- **Parent Volunteer, Central Church 2009-2014.** Helped with various rooms and projects for the church's Kid's ministry.
- **Service Coach, Central Church 2014-2020.** Was a coach for the student leaders for the junior high school kid's ministry and assisted the junior high pastors with anything needed for the services.
- **Gold Level Donor, Hope for Kids 2022.** My office donated to, and my family volunteered our time at the Hope for Kids Christmas drive through experience providing clothing, food, hygiene products and toys to needy families.

- **Small Group Ministry Leader, 2014 – Present.** I lead a women’s small group ministry of 8 women.
- **Student Alumni Council Ambassador, Indiana University East,** which had a mission of strengthening community relations and we were among the most visible student leaders on campus as well as acting as student recruiters off campus. We interacted with the Chancellor and other members of the administrative team and served as hosts to visiting VIP’s and at major public relations events.
- **Vice President** of the Phi Beta Lambda Business Fraternity. The purpose of the fraternity was to help students develop vocational competencies for business and office occupations and promote a sense of civic and personal responsibility. The major goal of the fraternity was to develop competent and aggressive business leadership and help develop character for useful citizenship.
- **President 2021-2022, Business Network International, 2009-2012, 2015-present**

33. List honors, prizes, awards, or other forms of recognition.

- **Alumni Hall of Fame Inductee, Indiana University East 2017.** I was recognized as a 2017 inductee to the University’s Alumni Hall of Fame where the university flew me to the red-carpet event, invited former professors, and even surprised me by bringing in former classmates whom I had not seen in years. I was presented with an incredible award. It was an experience unlike any other I have had, and it was a truly humbling evening.

Professional

- **Martindale-Hubbell AV Preeminent Rated Attorney (2012 to Present)**
- **AVVO 10.0 Rating (2013-Present)**
- **Google 4.8 Rating (73 current reviews)**
- **VegasInc Top Lawyer (2013)**
- **Desert Companion Top Lawyer (2014)**
- **American Registry Top One Percent & Most Honored Professionals (2016)**
- **VegasInc Top Lawyer (2020)**

Law School

- **Certificate for Outstanding Volunteer Service through Pro Bono Program – Spring 2000**
- **Certificate of Recognition for Outstanding Service through Pro Bono Program – Silver Level Volunteer - 2002**

Undergraduate

- **Chancellor’s List for 4.0 GPA – Fall 1997**
- **Dean’s List for 3.5 GPA or above – Spring 1998 & Spring 1999**

34. Have you at any time in the last 12 months belonged to, or do you currently belong to, any club or organization that in practice or policy restricts (or restricted during the time of your membership) its membership on the basis of race, religion, creed, national origin or sex? If so, detail the name and nature of the club(s) or organization(s), relevant policies and practices, and whether you intend to continue as a member if you are selected for this vacancy.

No

35. List books, articles, speeches and public statements published, or examples of opinions rendered, with citations and dates.

- Co-Authored a chapter in the book “The Soul of Success: Vol II” with Jack Canfield (2015)
- China’s Unlawful Control Over Tibet: The Tibetan People’s Entitlement to Self-Determination, Ind. Int’l & Comp. L. Rev. Vol 12:2, Pages 293 – 328, 2002.

Authored Sections in the Course Books for the following continuing education courses

- Insurance Coverage Trends (2006) – NBI Seminar
- Collection Law from Start to Finish (2007) – NBI Seminar
- Handling the Auto Injury Claim (2008) – NBI Seminar
- Family Law: What to do When...? (2016) – NBI Seminar
- Complex Assets in Divorce (2017) – NBI Seminar

36. During the past ten years, have you been registered to vote?

Yes

Have you voted in the general elections held in those years?

Yes

37. List avocational interests and hobbies.

- **Scouting Mom** – We have 2 Scouts and a Webelo in our family. We tent camp several times each year and love the family time together.
- **National Parks** - My family and I enjoy traveling, whether by plane, boat, car or RV, we love to see different areas of our country. We are National Park enthusiasts and love to visit and get passport stamps from as many of the parks that we can each year.

Conduct

38. Have you read the Nevada Code of Judicial Conduct and are you able to comply if appointed?

Yes

39. Have you ever been convicted of or formally found to be in violation of federal, state or local law, ordinance or regulation? Provide details of circumstances, charges, and dispositions.

No

40. Have you ever been sanctioned, disciplined, reprimanded, found to have breached an ethics rule or to have acted unprofessionally by any judicial or bar association discipline commission, other professional organization or administrative body or military tribunal? If yes, explain. If the disciplinary action is confidential, please respond to the corresponding question in the confidential section.

No

41. Have you ever been dropped, suspended, disqualified, expelled, dismissed from, or placed on probation at any college, university, professional school or law school for any reason including scholastic, criminal, or moral? If yes, explain.

Yes

I was put on academic probation my first semester of undergraduate school at Indiana University due to poor grades. I focused and studied harder the second semester and attended summer school. By the end of my undergraduate career, I had improved my grades to the point that I was a member of the Chancellor's List (4.0 GPA – Fall 1997) and the Dean's List (3.5 GPA or above – Spring 1998 & Spring 1999).

42. Have you ever been refused admission to or been released from any of the armed services for reasons other than honorable discharge? If yes, explain.

No

43. Has a lien ever been asserted against you or any property of yours that was not discharged within 30 days? If yes, explain.

No

44. Has any Bankruptcy Court in a case where you are or were the debtor, entered an order providing a creditor automatic relief from the bankruptcy stay (providing in rem relief) in any present or future bankruptcy case, related to property in which you have an interest?

No

45. Are you aware of anything that may require you to recuse or disqualify yourself from hearing a case if you are appointed to serve as a member of the judiciary? If so, please describe the circumstances where you may be required to recuse or disqualify yourself.

No, not unless a former client were to appear before me.

Other

46. If you have previously submitted a questionnaire or Application to this or any other judicial nominating commission, please provide the name of the commission, the approximate date(s) of submission, and the result.

Not Applicable.

47. In no more than three pages (double spaced) attached to this Application, provide a statement describing what you believe sets you apart from your peers, and explains what education,

experience, personality or character traits you possess, or have acquired, that you feel qualify you as a supreme court justice. In so doing, address appellate, civil (including family law matters), and criminal processes (including criminal sentencing).

See my “Personal Statement” attached below.

48. Detail any further information relative to your judicial candidacy that you desire to call to the attention of the members of the Commission on Judicial Selection.

See my “Personal Statement” attached below.

49. Attach a sample of no more than ten pages of your original writing in the form of a decision, “points and authorities,” or appellate brief generated within the past five years, which demonstrates your ability to write in a logical, cohesive, concise, organized, and persuasive fashion.

See a writing sample from a Motion to Dismiss attached below.

Personal Statement of Regina M McConnell, Esq.

First and foremost, thank you for your consideration of my application. I am honored to be in consideration to the appointment of Department O. This is a Courtroom where I already spend a significant portion of my time and know very well. Here are some bullet points to consider and I will elaborate below:

- **I have over 20 years of experience in Nevada Courtrooms (the last 15 in Family Court).**
- **I have a track record of being more effective and efficient which better serves the litigants and the public at large.**
- **Due to its large juvenile caseload, Department O is a perfect intersection of my skill set, passions, and expertise. I will make a significant difference for all who appear there.**

To begin, I was born and raised in Muncie, Indiana, the daughter of a homemaker and an honorably discharged and very proud Marine. I knew from a young age that I was going to be a lawyer because I wanted to help people, but no one from my family had previously been to college. I was well-aware that I had to be more disciplined and more dedicated than many of my peers if I were to achieve those goals. Thanks to a steadfast determination, a lot of studying, and strong test scores, I was accepted to Indiana University's undergraduate program and then to the Indiana University McKinney School of Law. Upon graduation in 2002, I immediately moved to Nevada and began studying for the bar exam, which had a much lower pass rate than the Indiana bar. I passed the bar exam on my initial attempt in 2002, and my husband and I were married in March of 2003. We have resided and raised our kids here ever since.

Upon admission to the Nevada Bar, I accepted an associate attorney position at an insurance defense firm. My time was spent working multiple client files simultaneously, drafting and arguing motions in court and going to trial. Sometime in 2005, I received a call from a recruiter who was shocked to hear that I, as a 3rd year attorney, already had extensive motion and trial practice inside courtrooms. It wasn't until then that I realized how valuable litigation time was to an associate, and how few love the process and procedure like I do. I am an organized person, so the rules of civil procedure have always been easy for me to comprehend and adhere to.

As stated above, I wanted to be an attorney so that I could help people. During 2007, I felt like it was time to move out on my own where I could focus more of my time on making the second part of that statement become a reality. That is when I started my own family law practice because I genuinely wanted to help good people who found themselves in tough situations.

Over the past 15 years, I have built my practice (and my reputation) on finding the best, most efficient solutions to help my clients. The family litigation process is often extremely expensive and slow to resolve. This leaves families in limbo about their future, and I believe that affects how well they function in society. My clients hire me because I promise to find efficient ways to accomplish their legal objectives in a prompt and cost-effective manner. I don't allow cases to drag on endlessly. This is the difference I will make to many more litigants as a Family Court Judge.

I believe that our citizens are best served with an efficient and effective family litigation process. This allows them to focus on pursuing their careers, rebuilding their personal lives, and pursuing productive behaviors instead of being caught up in endless, expensive litigation. Finally, since Nevada is a "no-fault" state, my approach is even more viable as there is no need for blame.

As an example of the difference I can make, let me explain my unsuspecting foray into DFS adoptions. Six years ago, I was approached by a personal friend to help them with their adoption of a foster child. The circumstances for the child were very sad, but I knew my friends would provide an amazing home. He had such a rough start to his life and had been removed from his birth parent by the state. In communicating with their case worker, I learned that even after the birth parent's rights are terminated by the State, these cases could take an extensive amount of time to reach the official adoption stage. It was not uncommon for a case to linger 4-6 months in the system. I learned that the passing of each day leaves a potential family in limbo, a caseworker overloaded with extra cases, a courtroom with a growing docket, and a public policy promise unfulfilled.

I knew that I could help the court system and DFS by getting these foster-to-adoption cases closed quickly and bringing permanency to these families. In addition to my other family law cases, I developed a process in my office to fast-track these cases. As a result, I have now helped over 800 foster kids through

their adoption process and over 260 just last year. This represents almost 50% of the reported 555 children who were permanently adopted during according to the latest Clark County Statistics ([link](#)). More importantly, by working efficiently and effectively, my clients are typically a forever family within 20 days after I receive the case (not 4-6 months). I am so proud of this work because I know I have made a difference in the lives of everyone involved in the case. This is why I am so motivated to be the next Judge for Department O, and this is the skill set I will bring to the bench. I am confident that my efficiency will be appreciated by the litigants, their employers, and even their attorneys while in my courtroom.

Finally, to give you a little more information about my personal life. My husband and I will celebrate our 20th anniversary in March and are raising three children (ages 10, 11, and 14). We are very active in our community. For example, we recently sponsored a booth at an event called “Hope for Kids” where families in need drove through an amazing Christmas experience filled with lights, music and even snow. We filled their cars with appropriately sized clothing, coats, PJ’s, food, hygiene products, and toys for their children. Watching my kids serve and interact with those families was a great blessing for me last year, and I am proud that serving others is where we choose to spend part of our family time.

In closing, I sincerely believe that I can help even more people through our family court system as a Judge than I currently do as an advocate. Good people find themselves in difficult situations. Helping them has always been my goal and purpose as an attorney. I have a long career ahead of me. As a Judge, I will make a significant difference to even more people inside our family court system. They deserve an arbiter who will move their case through the system fairly, efficiently, and effectively so that they can move on with their lives. Thanks again for your consideration. It would be an honor to serve as your next Judge in Department O.

Writing Sample**MEMORANDUM OF POINTS AND AUTHORITIES****I. SUMMARY OF ARGUMENT**

1
2
3
4 Plaintiff (hereinafter "John Doe") and Defendant (hereinafter "Jane Doe") were married on
5 October 3, 2015 and have one child, born the issue of their marriage, to wit: Baby Girl (hereinafter
6 "Baby"), born January 1, 2016. John Doe filed a Complaint on January 1, 2020 and is engaged in
7 forum shopping by improperly filing a Complaint for Divorce, knowing that the minor child and Jane
8 Doe are residents of Texas after he abandoned them together in their last residence in a different
9 country. Nevada does not have personal jurisdiction over Jane Doe or subject matter jurisdiction over
10 the custodial matters that must necessarily be rendered with dissolution proceedings. This court
11 should determine that Texas is the more convenient forum to address those issues inherent in this
12 divorce.
13
14

II. STATEMENT OF FACTS

15
16 John Doe and Jane Doe have traveled all over the world due to John Doe's wishes as he
17 worked remotely. To this end, the parties were married and had their child in Austin, Texas. John
18 Doe then moved them to San Diego, Costa Rica, Panama, Paris and most recently, Tel Aviv where
19 they have been for the last three years. During their time in Tel Aviv, John Doe was being
20 investigated on two different occasions for domestic violence. The first incident occurred on July 4,
21 2019 wherein he originally lied to the investigators and denied his actions so he was removed from
22 their home for nine (9) days. At the hearing when Jane Doe asked for an additional restraining order,
23 John Doe admitted to striking her so the 30-day restraining order was granted and he was given
24 credit for 9 days spent away from home.
25

26
27 On or about August 20, 2019, he was arrested a second time for domestic violence. At that
28 time, he left the residence even though she did not call the police. He immediately returned but she

1 would not let him in, so he kept ringing the doorbell and eventually called the police. When the
2 police officer arrived, Jane Doe explained the incident and he was arrested. However, he made a false
3 complaint about Jane Doe so she had to drag Baby down to the station and they were both
4 questioned. As a result of the second arrest, John Doe was removed from their home for fifteen (15)
5 days.

6 John Doe's friend came to the apartment to collect bags of John Doe's items that Jane Doe had
7 packed for him while he was away from the home; however during those two weeks, John Doe never
8 tried to reach out to speak to Baby or see her. Jane Doe had not heard from him at all. Because of his
9 lack of contact, Jane Doe called his employer and was told by his boss that he had quit and moved
10 back to the United States. He abandoned Jane Doe and their child and left them alone in Tel Aviv,
11 Israel, with no means for support, no health insurance¹ and no means for them to return home to
12 Texas. After a few weeks of struggling to figure out how to get home, Jane Doe and Baby were finally
13 able to return to Texas with the help of her family. As such, Jane Doe and Baby are currently residing
14 in El Paso, Texas.

15 Jane Doe found out that John Doe was staying with his mother in Las Vegas, but he was still
16 being vague as to what was going on and why he abandoned Jane Doe and Baby. However, on
17 October 15, Jane Doe was served in El Paso, Texas with the Complaint for Divorce that John Doe had
18 filed on October 6, 2020. Upon Jane Doe's belief, John Doe had not lived in Nevada for the 6-week
19 timeframe before filing his Complaint and Jane Doe and Baby have never lived in Las Vegas, Nevada.
20 Further, it is important to note that throughout this marriage, Jane Doe has been the primary care
21 provider for Baby and gave up a career to follow John Doe in all of their moves around the world.
22

23 To this end, Jane Doe is seeking that the Court dismiss the action filed in the state of Nevada
24 and requests that this Court award her attorney's fees for having to bring this Motion.
25
26
27

28 ¹ This has impacted Jane Doe tremendously because she does have a chronic health condition that requires lifelong medication and now she must pay out of pocket for her doctors and medication.

III. LEGAL ARGUMENT

A. This Court Lacks Personal Jurisdiction over Defendant, Jane Doe

When a challenge to personal jurisdiction is made, the Plaintiff has the burden of introducing competent evidence of essential facts which establish prima facie showing that personal jurisdiction exists. *Trump v. District Court*, 109 Nev. 687, 699, 857 P.2d 740, 748 (1993) (internal citations omitted). Jane Doe challenges jurisdiction.

In *Trump*, the Nevada Supreme Court established a two-step test for determining the propriety of asserting personal jurisdiction. *Trump*, 109 at 699. It is well established that in order to obtain jurisdiction over a non-resident defendant, a Plaintiff must show: (1) that the requirements of the state's long-arm statute have been satisfied, and (2) that due process is not offended by the exercise of jurisdiction. Hence, the relevant state's long-arm statute must permit jurisdiction and second, the exercise of jurisdiction must be consistent with the demands of due process. *Greenspun v. Del E. Webb Corporation*, 634 F.2d 1204, 1207 (9th Cir. 1980) (citations omitted).

As to the first inquiry, N.R.S. §14.065 states:

1. A court of this state may exercise jurisdiction over a party to a civil action on any basis not inconsistent with the Constitution of this state or the Constitution of the United States.

2. Personal service of summons upon a party outside this state is sufficient to confer upon a court of this state jurisdiction over the party so served if the service is made by delivering a copy of the summons, together with a copy of the complaint, to the party served in the manner provided by statute or rule of court for service upon a person of like kind within this state.

3. The method of service provided in this section is cumulative, and may be utilized with, after or independently of other methods of service.

The "statutory limitations upon jurisdiction are coextensive with the outer limits of due process under the state and federal constitutions, as those limits have been defined by the United States Supreme Court." *Data Disc, Inc. v. Systems Technology Associates, Inc.*, 557 F.2d 1280, 1286 (9th

1 Cir. 1977) (internal quotation omitted). Hence, Nevada authorizes jurisdiction only where the
2 demands of due process are satisfied.

3 Under the Fourteenth Amendment's Due Process Clause, a nonresident defendant must have
4 sufficient "minimum contacts" with the forum state so that subjecting the defendant to the state's
5 jurisdiction will not "offend traditional notions of fair play and substantial justice." *Arbella Mut. Ins.*
6 *Co. v. Eighth Judicial Dist. Court*, 122 Nev. 509, 512, 134 P.3d 710, 712 (2006) (internal quotations
7 omitted). Indeed, Section 1 of the Fourteenth Amendment to the Constitution of the United States of
8 America provides:
9

10 All persons born or naturalized in the United States, and subject to the
11 jurisdiction thereof, are citizens of the United States and of the state
12 wherein they reside. No state shall make or enforce any law which shall
13 abridge the privileges or immunities of citizens of the United States; nor
14 shall any state deprive any person of life, liberty, or property, without
due process of law; nor deny to any person within its jurisdiction the
equal protection of the laws.

15 The U.S. Supreme Court held in *International Shoe Co. v. Washington*, 326 U.S. 310, 66 S. Ct. 154
16 (1945), that a Defendant must "have certain minimum contacts with [the forum state] such that the
17 maintenance of the suit does not offend traditional notions of fair play and substantial justice." The
18 Court further stated that "Constitutional due process requires that a Defendant have sufficient
19 "minimum contacts" with the forum state and that a state may not "make binding a judgment in
20 personam against **an individual or corporate defendant** with which the state has no contact, ties or
21 relation."
22

23 In *MGM Grand v. Eighth Judicial Court*, 807 P.2d 201 (1991), our State Supreme Court held that
24 it is impermissible for the court to exercise personal jurisdiction over a Defendant who does not
25 possess minimal contact with the State of Nevada and where it would be against the constitutional
26 rights for failure to have minimal contacts with the State of Nevada. Thus, the U.S. Supreme Court
27 requires that the forum inquire whether it is "reasonable...to require the [individual] to defend the
28

1 particular suit that is brought there.” *Worldwide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 292, 100
2 S.Ct. 559, 564-65 (1980). Indeed, “[t]he unilateral activity of those who claim some relationship with a
3 nonresident defendant cannot satisfy the requirement of contact with the forum state.” *Burger King v.*
4 *Rudzewicz*, 471 U.S. 462, 474, 105 S.Ct. 2174, 2183 (1985).

5 *The burden of proof rests solely with the Plaintiffs to provide evidence of personal*
6 *jurisdiction of the Defendant and that burden never shifts to the party challenging the jurisdiction.*
7 *A.I. Trade Finance, Inc., v. Petra Bank*, 989 F.2d 76, 80 (2nd Cir.1993). See also, *United Elec. Workers v.*
8 *163 Pleasant Street Corp.*, 987 F.2d 39, 43-44 (1st Cir.1993); *Conti v. Pneumatic Products Corp.*, 977 F.2d
9 978, 987 (6th Cir. 1992); *Bolt v. Gar-Tec Products, Inc.*, 967 F.2d 671, 675 (1st Cir. 1992); *Gould v. P.T.*
10 *Krakatau Steel*, 957 F.2d 573, 575 (8th Cir. 1992).

12 General personal jurisdiction, which enables a court to hear cases unrelated to the defendant’s
13 forum activities, exists only if the Defendant has “substantial” or “continuous and systematic contact
14 with the forum state.” *Fields v. Dedgwick Associated Risk, Ltd.*, 796 F.2d 299. In practice, general
15 jurisdiction is a fairly high standard. *Id.* Jane Doe does not have minimum contacts with Nevada; Jane
16 Doe does not have “substantial activities” in Nevada; Jane Doe does not have “continuous and
17 systematic activities” in Nevada; therefore, Nevada does not have general jurisdiction of Jane Doe.

18
19 Lastly, Nevada does not have specific jurisdiction of Jane Doe. To determine whether specific
20 jurisdiction comports with due process, the Defendant (1) must have done some act purposely to
21 avail himself of the privilege of conducting activities in the forum; (2) the claim must arise out of the
22 defendant’s forum related activities; and (3) the exercise of jurisdiction must be reasonable. See, Id.

24 In order to determine the reasonableness in order to exercise jurisdiction over a non-resident
25 defendant, the Court must examine seven (7) factors, to wit: (1) the existence of an alternate forum,
26 (2) the burden on the defendant to defend the suit in the chosen forum; (3) the most efficient judicial
27 resolution of the controversy, (4) the importance of the chosen forum to plaintiff’s interest in
28

1 obtaining convenient and effective relief, (5) the extent of defendant's purposeful interjection into the
2 chosen forum, (6) the extent of conflict with sovereignty of the defendant's state, and (7) the forum
3 state's interest in the dispute. *Id.*; See also *Pacific Atlantic Trading Co. v. M/V Main Express*, 758 F.2d
4 1325,1329-31; and *Cabbage v. Merchant*, 744 F.2d 665, 670. With due consideration, these factors clearly
5 support Jane Doe. Nevada should decline to proceed with this matter.

6
7 The facts of this case clearly demonstrate that Nevada, not having personal jurisdiction over
8 Jane Doe, should quash service of process against Jane Doe and direct the parties to litigate the
9 matter, in its entirety, in Texas. Texas is undeniably the more convenient forum, has personal
10 jurisdiction of Jane Doe, is the residing state of Baby, and where the bulk of all relevant evidence of
11 the parties is found. Such a ruling would also be consistent with NRS 125A.365.

12 **B. The Lack of Personal Jurisdiction and Subject Matter Jurisdiction Under the UCCJEA**
13 **Precludes Awarding John Doe the Relief He Requests.**

14
15 John Doe has filed for divorce here in Nevada even though Jane Doe resides with Baby in
16 Texas. It is significant to note that John Doe is seeking, in addition to the divorce and custodial
17 orders, attorney's fees—*none of which can be entertained or awarded without personal jurisdiction*
18 *of Jane Doe.*

19
20 As noted above, the UCCJEA requires a trial court to relinquish, or decline to exercise,
21 jurisdiction over custodial matters when there is a more convenient forum. In this case, when
22 applying all applicable factors, is undeniably Texas.

23 NRS §125A.305 Initial child custody jurisdiction reads:

24 1. Except as otherwise provided in NRS 125A.335, a court of this
25 State has jurisdiction to make an initial child custody determination only
26 if:

27 (a) This State is the home state of the child on the date of the
28 commencement of the proceeding or was the home state of the child
within 6 months before the commencement of the proceeding and the

1 child is absent from this State but a parent or person acting as a parent
2 continues to live in this State;

3 (b) A court of another state does not have jurisdiction pursuant to
4 paragraph (a) or a court of the home state of the child has declined to
5 exercise jurisdiction on the ground that this State is the more appropriate
6 forum pursuant to NRS 125A.365 or 125A.375 and:

7 (1) The child and the child's parents, or the child and at least one
8 parent or a person acting as a parent, have a significant connection with
9 this State other than mere physical presence; and

10 (2) Substantial evidence is available in this State concerning the
11 child's care, protection, training and personal relationships;

12 (c) All courts having jurisdiction pursuant to paragraph (a) or (b)
13 have declined to exercise jurisdiction on the ground that a court of this
14 State is the more appropriate forum to determine the custody of the child
15 pursuant to NRS 125A.365 or 125A.375; or

16 (d) No court of any other state would have jurisdiction pursuant
17 to the criteria specified in paragraph (a), (b) or (c).

18 2. Subsection 1 is the exclusive jurisdictional basis for making a
19 child custody determination by a court of this State.

20 3. Physical presence of, or personal jurisdiction over, a party or a
21 child is not necessary or sufficient to make a child custody determination.

22 Nevada is NOT the minor child's home state. The minor child has NOT been in Las Vegas at
23 all prior to the filing of the underlying action. Neither Jane Doe nor the parties' minor child have any
24 connection with this State other than John Doe's temporary physical presence for less than 2 months.
25 Undeniably, Texas is the minor child's current state and is where the minor child was born. Courts
26 have repeatedly held that a temporary absence does not divest the home state from its continuing
27 exclusive jurisdiction pursuant to the UCCJEA and while this may not have been a temporary absence
28 from Texas, the child has never lived in Nevada.

The only State that has the requisite jurisdiction to address and enter any enforceable orders
pertaining to custody and attorney's fees is Texas. If this Court does not direct the parties to properly
litigate all matters in Texas there will be duplication of many services not to mention the use of many

1 more that could otherwise be obviated. Additionally, the services of two forums are being utilized
2 which results in a waste of judicial resources.

3 It is expected, given the applicability of applicable law to the facts of this case, that this Court
4 will decline to exercise jurisdiction over this matter and defer to the State of Texas for adjudication of
5 all the parties rights and claims.

6 **C. Jane Doe Should be Awarded Attorney's Fees.**

7 Jane Doe respectfully requests an award of attorney's fees for having to bring this motion. To
8 this end, NRS 18.010 states in pertinent part:
9

10 2. In addition to the cases where an allowance is authorized by specific statute,
11 the court may make an allowance of attorney's fees to a prevailing party:

12 (a) When he has not recovered more than \$20,000; or

13 (b) Without regard to the recovery sought, when the court find that the
14 claim, counterclaim, cross-claim or third party complaint or defense of the
15 opposing party was brought without reasonable ground or to harass the
prevailing party.

16 Under *Brunzell v Golden Gate National Bank*, 85 Nev. 345 (1969), the Court should take into
17 consideration the following factors when determining an award of attorney's fees: (1) the qualities of
18 the advocate, (2) the character and difficulty of the work performed; (3) the work actually performed
19 by the attorney; and (4) the result obtained. The undersigned has been practicing law for eighteen
20 years, with approximately 95% of her practice dedicated to all aspects of family law for the last twelve
21 years. The character and difficulty of the work performed in this matter is moderate, with the main
22 issues being John Doe's filing of a Complaint knowing that his wife and minor child are residents of
23 Texas and have no contacts with this State. To date, the work performed with regards to the instant
24 situation includes gathering of information and drafting the Motion. Counsel has, through application
25 of law to facts, striven to present a concise and logical picture of where these parties are and what is
26 the appropriate conclusion for the court to reach.
27
28