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2008 JUL 22 PM 12:14

HOWARD W. CONYERS  
R. Simpson  
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1 CODE 4105 . . .  
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8 Attorney Eloise Besada Furer

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

11 ANDREW EARL FURER )  
12 )  
13 Plaintiff, )  
14 vs. ) CASE NO.: FV04-04071  
15 ) DEPT NO.: 11  
16 ELOISE BESADA FURER, )  
17 ) **REQUEST FOR SUBMISSION AND**  
18 ) **MOTION TO SUPPLEMENT OPPOSITION**  
19 ) **TO COMPLAINTENT'S MOTION TO**  
20 ) **SHOW CAUSE**  
21 Defendants. )

21 COMES NOW, ERIK FITTING, ESQ. of the law firm ERIK FITTING &  
22 ASSOCIATES, LTD., hereby files this Request for Submission and accompanying  
23 documents pursuant to the Nevada Rules of Civil Procedure, Rule 15, as a Supplement to  
24 Adverse Party Mrs. Eloisa Furer's Opposition to Complaintent's Motion to Show Cause.

25 This Motion is based on the attached unedited Affidavit of Mrs. Eloisa Furer, the  
26 attached Memorandum of Points and Authorities, the documents attached thereto, together  
27 with all pleadings and papers on file herein.

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Rule 15 (d) of the Nevada Rules of Civil Procedure (NRCPP) specifically states:

3 **RULE 15. AMENDED AND SUPPLEMENTAL PLEADINGS**

4  
5 . . .(d) **Supplemental Pleadings.** Upon motion of a party the court may, upon reasonable notice and upon  
6 such terms as are just, permit the party to serve a supplemental pleading setting forth transactions or  
7 occurrences or events which have happened since the date of the pleading sought to be supplemented.  
8 Permission may be granted even though the original pleading is defective in its statement of a claim for relief or  
9 defense. If the court deems it advisable that the adverse party plead to the supplemental pleading, it shall so  
10 order, specifying the time therefor.

11  
12 Adverse Party Mrs. Eloisa Furer timely filed an Opposition to Complaintant's Motion  
13 to Show Cause that was filed in the pending action on or about March 25, 2008. In accordant  
14 with NRCPP Rule 15(d), Adverse Party hereby request this Honorable Court leave to  
15 supplement certain documents, affidavits and affirmations that have been received or  
16 discovered subsequent to Adverse Party's previously filed Opposition to Complaintant's  
17 pending Motion.

18 This Motion is made in good faith and without any intent to harass or delay the  
19 pending proceedings or the hearing on Complaintant's Motion scheduled for oral argument  
20 on or about July 24, 2008. This pleading is intended to be an addition to Adverse Party's  
21 previously filed Opposition, and is not intended to alter or amend such pleading in any  
22 manor. DATED this 15 day of July, 2008.

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25 ERIK FITTING & ASSOCIATES, LTD.

26   
27 ERIK FITTING, ESQ.

28 Nevada Bar No. 7336

29 9421 Crown Vista Lane

30 Las Vegas, NV 89117

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Attorney Eloisa Besada Furer

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2 **SECOND JUDICIAL DISTRICT COURT**  
3 **COUNTY OF WASHOE, STATE OF NEVADA**  
4 **AFFIRMATION**  
5 **Pursuant to NRS 239B.030**

6 The undersigned does hereby affirm that the preceding

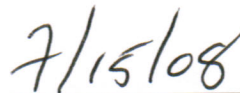
7 **DEFENDANT, ELOISA BESADA FURER'S REQUEST FOR SUBMISSION AND**  
8 **MOTION TO SUPPLEMENT OPPOSITION TO COMPLAINT'S MOTION TO**  
9 **SHOW CAUSE**

10 filed in or submitted for District Court Case Number FV04-04071

11 Does NOT contain the social security number of any person

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16 Erik A. Fitting, Esq

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Date

