

Spousal Support & Attorneys Fees

1.5 Hour CLE Training

Friday, August 22, 2014

11:30 a.m. – 1:00 p.m.

Presenter:

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Pecos Law Group

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■■■■ *of Southern Nevada*

Spousal Support and Attorney's Fees

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Class Overview

- 1 ½ hours.
- Purpose of the Class.
- Spousal Support.
- Attorney's Fees.
- Questions and Discussion.



Spousal Support is Alimony

- Some terms are interchangeable.
- Questions.

Alimony Overview

- Jurisdictional Bases for Alimony.
- Types of Alimony – Pre and Post Divorce.
- Legal Authority for Awards of Alimony.
- Procedural Rules and Requirements Unique to Family Law Cases.
- Potential Post-Divorce Jurisdictional Issues.
- Implications Outside of Family Law.
- What to say to clients.

Alimony Jurisdiction

- NRS Title 11 – Domestic Relations
- Chapter 125 – Dissolution of Marriage
 - Divorce
 - Separate Maintenance
 - Annulment

Alimony Jurisdiction in Divorce

- NRS 125.010: Causes for Divorce.
- NRS 125.020: Jurisdiction of District Court.
- NRS 125.040 and NRS 125.150: District Court has Discretion to Award Alimony in Divorce Cases.

Alimony Jurisdiction in Separate Maintenance Cases

- NRS 125.190: Action by spouse for permanent support and maintenance.
- NRS 125.200: Power of Court to Require Spouse to Pay Expenses of Litigation and Support.
- NRS 125.250: Procedure and Practice as in Actions for Divorce.



Annulment – No Jurisdiction

Williams v. Williams, 120 Nev. 559, 562, 97 P.3d 1124, 1126 (2004)(discussing Putative Spouse Doctrine)

Under the doctrine, an individual whose marriage is void due to a prior legal impediment is treated as a spouse so long as the party seeking equitable relief participated in the marriage ceremony with the good-faith belief that the ceremony was legally valid....However, *absent fraud, the doctrine does not apply to awards of spousal support*. While some states have extended the doctrine to permit spousal support awards, they have done so under the authority of state statutes.



4 Types of Alimony in Nevada

- **Pre-Divorce**
 - Interim Spousal Support, a/k/a "temporary maintenance."
- **Post-Divorce**
 - Permanent
 - Periodic or Lump Sum
 - Rehabilitative

Pre-Divorce Alimony

Interim Spousal Support:

NRS 125.040 Orders for support and cost of suit during pendency of action.

1. *In any suit for divorce the court may, in its discretion*, upon application by either party and notice to the other party, ***require either party to pay moneys necessary to assist*** the other party in accomplishing one or more of the following:

(a) ***To provide temporary maintenance for the other party;***

(b) To provide temporary support for children of the parties; or

(c) To enable the other party to carry on or defend such suit.

2. ***The court may make any order affecting property of the parties, or either of them, which it may deem necessary or desirable to accomplish the purposes of this section.*** Such orders shall be made by the court only after taking into consideration the financial situation of each of the parties.



Pre-Divorce Alimony – The Arguments

- Community Property Law
- *Sargeant v. Sargeant*, 88 Nev. 223, 495 P.2d 618 (1972).

Pre-Divorce Alimony

Community Property

Community Property Law

NRS 123.220 Community property defined.

All property, other than that stated in NRS 123.130, acquired after marriage by either husband or wife, or both, is community property unless otherwise provided by:

1. An agreement in writing between the spouses.
2. A decree of separate maintenance issued by a court of competent jurisdiction.
3. NRS 123.190.
4. A decree issued or agreement in writing entered pursuant to NRS 123.259.

NRS 123.130 Separate property of wife; separate property of husband.

1. All property of the wife owned by her before marriage, and that acquired by her afterwards by gift, bequest, devise, descent or by an award for personal injury damages, with the rents, issues and profits thereof, is her separate property.

2. All property of the husband owned by him before marriage, and that acquired by him afterwards by gift, bequest, devise, descent or by an award for personal injury damages, with the rents, issues and profits thereof, is his separate property.



Pre-Divorce Alimony

Sargeant v. Sargeant

Sargeant v. Sargeant, 88 Nev. 223, 495 P.2d 618 (1972).

The *wife must be afforded her day in court without destroying her financial position*. This would imply that *she should be able to meet her adversary in the courtroom on an equal basis*. Here, without the court's assistance, the wife would have had to liquidate her savings and jeopardize the child's and her future subsistence still without gaining parity with her husband.

Id. at 226-27 (Emphasis added).



Pre-Divorce Alimony

Summary of the Argument

- Earned income is property.
- Property acquired post-marriage is community property unless there is an agreement otherwise.
- The “community” is not severed in Nevada until the date of divorce. See NRS 125.130(2)
- Thus, until a divorce is final, spouses have “present, existing and equal interests” in the community property. See NRS 123.225
- NRS 125.040 gives the court authority to provide temporary maintenance and allocate property for support during the pendency of the divorce.
- *Sargeant* says a spouse is entitled to meet his/her future ex in court on an equal footing without destroying his or her financial position.
- So rather than having a spouse having to liquidate his/her own assets, the community should support both spouses – meaning interim support from the higher wage earner.



Financial Disclosures

EDCR 5.32 Motions for support; fees and allowances; affidavit of financial condition required.

(a) *Any motion for* fees and allowances, *temporary spousal support*, child support, exclusive possession of a community residence, or any other matter involving the issue of money to be paid by a party ***must be accompanied by an affidavit of financial condition describing the financial condition and needs of the movant.*** The affidavit of financial condition ***must be prepared on a form approved by the court.*** An incomplete affidavit or the absence of the affidavit of financial condition may be construed as an admission that the motion is not meritorious and as cause for its denial. Attorney's fees and other sanctions may be awarded for an untimely, fraudulent, or incomplete filing.

(b) *Any party opposing a motion for* fees and allowances, *temporary spousal support*, child support, exclusive possession of the community residence, or any other matter involving the issue of money to be paid by a party ***must also submit an affidavit of financial condition describing the financial condition of that party at the time of the filing of the opposition or no later than 2 days before the date of hearing,*** whichever is earlier. The affidavit of financial condition must be prepared on a form approved by the court. The failure of a party opposing such motion to file an affidavit of financial condition may be construed as an admission that the opposing party has the resources to pay the amount requested by the moving party or has the resources to permit the other party to have exclusive possession of the marital residence. Attorney's fees and other sanctions may be awarded for an untimely, fraudulent or incomplete filing.



Financial Disclosures

So, what is an Affidavit of Financial Condition?

- It allows the court to look at the parties' claimed financial positions. The term itself is an outdated term, and the rule will soon be changed to reflect the new term, "**Financial Disclosure Form**," or "FDF," which is the "form approved by the court" mentioned in the rule.
- Where can you find information about the Financial Disclosure Form?
- Repeated updates over past several years. Newest forms at:
 - <http://www.theabramslawfirm.com>
 - <http://willicklawgroup.com/clark-county-bench-bar-committee/>
- So, you must file the FDF anytime you file a request for financial relief, including interim spousal support.

The Financial Disclosure Form

- **NRCP 16.2**
 - Divorce, Annulment and Separate Maintenance cases.
- **NRCP 16.205**
 - Paternity and Custody Cases.
- **NRCP 16.21**
 - Post-Judgment Discovery in Domestic Relations Cases.



The Financial Disclosure Form

NRCPP 16.2(b) Required Disclosures.

(1) General Financial Disclosure. In divorce, annulment, or separate maintenance actions, or proceedings to dissolve a domestic partnership, each party must complete and file the court-approved General Financial Disclosure Form.

...

A party must file and serve the completed General Financial Disclosure Form no later than 30 days after service of an answer to the complaint, unless the parties are otherwise directed to file a Detailed Financial Disclosure Form, or the court orders otherwise upon the motion of a party or the stipulation of the parties.



Know the Rules

Outside scope of the class, but... There are lots of other requirements contained in rules 16.2 and 16.205.

- There are mandatory disclosures.
- There are sanctions allowed for failures to voluntarily disclose documents.
- There are sanctions allowable for failure to include assets or debts on the FDF.
- There is an authorization that discovery may begin 30 days after service of the answer.
- There are dates for mandatory disclosure of witnesses, trial exhibits, etc.
- There is a deadline to object to authentication of documents otherwise you cannot object to a document on that basis. (Shall not be excluded on that basis if objection is not timely).
- There is a deadline to object to trial exhibits, otherwise they are waived (except relevance, unfairly prejudicial, waste of time or confusing) unless the waiver is deemed excused for good cause.

In other words, if you are doing a family law case **LEARN THESE RULES** from the outset of your family law case.



Post-Divorce Alimony

Permanent Alimony

Permanent alimony is “lifetime alimony.”

In other words, the term of the payments is generally the length of the life of the first party to die.

Periodic or Lump Sum Alimony

“Periodic or Lump Sum Alimony” means there is a specified date when the alimony obligation will automatically end.

Rehabilitative Alimony

Alimony meant to specifically provide money for a post-divorce spouse to obtain necessary training or education.



Post-Divorce Alimony Statute

Court Has Wide Discretion in Award of Alimony

NRS 125.150(1)(a)

In granting a divorce, *the court may award such alimony* to the wife or to the husband, in a specified principal sum or as specified periodic payments, *as appears just and equitable.*



Post-Divorce Alimony Statute

Alimony Factors

NRS 125.150(8) – Alimony Factors

8. In addition to any other factors the court considers relevant in determining whether to award alimony and the amount of such an award, the court shall consider:

- (a) The financial condition of each spouse;
- (b) The nature and value of the respective property of each spouse;
- (c) The contribution of each spouse to any property held by the spouses pursuant to NRS 123.030;
- (d) The duration of the marriage;
- (e) The income, earning capacity, age and health of each spouse;
- (f) The standard of living during the marriage;
- (g) The career before the marriage of the spouse who would receive the alimony;
- (h) The existence of specialized education or training or the level of marketable skills attained by each spouse during the marriage;
- (i) The contribution of either spouse as homemaker;
- (j) The award of property granted by the court in the divorce, other than child support and alimony, to the spouse who would receive the alimony; and
- (k) The physical and mental condition of each party as it relates to the financial condition, health and ability to work of that spouse.

Post-Divorce Alimony Statute

Separate Property May Be Set Aside for Alimony

NRS 125.150(4)

In granting a divorce, the court may also set apart such portion of the husband's separate property for the wife's support, the wife's separate property for the husband's support or the separate property of either spouse for the support of their children as is deemed just and equitable.



Post-Divorce Alimony Statute

Automatic Termination

NRS 125.150(5)

In the event of the death of either party or the subsequent remarriage of the spouse to whom specified periodic payments were to be made, all the payments required by the decree must cease, unless it was otherwise ordered by the court.



Post-Divorce Alimony Statute

Modification

NRS 125.150(7)

The decree or agreement is not subject to modification by the court as to accrued payments.

Payments which have not accrued at the time a motion for modification is filed may be modified upon a showing of changed circumstances, whether or not the court has expressly retained jurisdiction for the modification.

The court shall consider whether the income of the spouse who is ordered to pay alimony, as indicated on the spouse's federal income tax return for the preceding calendar year, has been reduced to such a level that the spouse is financially unable to pay the amount of alimony the spouse has been ordered to pay.



Post-Divorce Alimony Statute

Changed Circumstances

NRS 125.150(11)

A change of 20 percent or more in the gross monthly income of a spouse who is ordered to pay alimony shall be deemed to constitute changed circumstances requiring a review for modification of the payments of alimony.



Post-Divorce Alimony Statute

Rehabilitative Alimony

NRS 125.150(9)

The court shall consider the need to grant rehabilitative alimony to a spouse for the purpose of obtaining training or education relating to a job, career or profession.

In addition to any relevant factor the court shall consider:

Whether the spouse who would pay such alimony has obtained greater job skills or education during the marriage; and

Whether the spouse who would receive such alimony provided financial support while the other spouse obtained job skills or education.

If awarding rehabilitative alimony the court must provide for the time within which the spouse who is the recipient of the alimony must commence the training or education relating to a job, career or profession.

The award may be in addition to the award of other alimony, and is meant to provide money for testing, evaluation, guidance, subsidization, assistance, and payment in furtherance of the recipient's education or future career.



Post-Divorce Alimony

Case Law

Misconduct of a Party

Nevada is a no fault state. For alimony purposes, this means that fault or bad acts cannot be considered for purposes of determining alimony.

Rodriguez v. Rodriguez, 116 Nev. 993, 13 P.3d 415 (2000)(extra-marital affair).

We hold that when considering an award of alimony, the court may not consider either party's misconduct or fault.

...

Alimony is not a sword to level the wrongdoer. Alimony is not a prize to reward virtue. Alimony is financial support paid from one spouse to the other whenever justice and equity require it.

Id. at 998-99.

Post-Divorce Alimony

Case Law

Alimony Factors

While the mandatory factors are set forth in statute, there are numerous cases that deal with the factors the court should consider.

Buchanan v. Buchanan, 90 Nev. 209, 523 P.2d 1 (1974)

Sprenger v. Sprenger, 110 Nev. 855, 878 P.2d 284 (1994)



Post-Divorce Alimony

Case Law

Lump Sum

Daniel v. Baker, 106 Nev. 412, 794 P.2d 345 (1990).

Schwartz v. Schwartz, 126 Nev. Adv. Op. 8, 225 P.3d 1273 (2010)

Generally, a lump sum is appropriate where age or health of the paying spouse indicates that a periodic award would be illusory.



Post-Divorce Alimony

Case Law

Cohabitation

Gilman v. Gilman, 114 Nev. 416, 424, 956 P.2d 761, 766 (1998)(consolidated cases of two ex-husbands).

[W]e hold that a showing that the recipient spouse has an actual decreased financial need for spousal support due to the fiscal impact of a cohabitant may constitute changed circumstances sufficient to require a modification of unaccrued payments under that support obligation.



Post-Decree Jurisdiction

Modification Jurisdiction

Jurisdiction to modify under the explicit provisions of the statute.

Enforcement Jurisdiction

NRS 125.180: Judgment for arrearages in payment of alimony and support.

Accrued Payments are a Property Right

Day v. Day, 82 Nev. 317, 320, 417 P.2d 914, 916 (1966):

Payments once accrued for either alimony or support...become vested rights and cannot thereafter be modified or voided.

Contempt

NRS 22.010: Acts or omissions constituting contempts.



Post-Decree Jurisdiction

What About Out-of-State Alimony Orders?

UIFSA – Uniform Interstate Family Support Act (NRS Chapter 130)

Nevada cannot modify an out-of-state spousal support order unless the issuing state's law allows Nevada to modify the order.

Other states likely cannot modify a Nevada spousal support order.



Alimony in Separate Maintenance Cases

Separate Maintenance

Same as in a divorce case.



Alimony in Same-Sex Partnerships

- Alimony is a statutory creation in Nevada.
- The alimony statutes are based upon the “dissolution of marriage.”
- The Nevada Constitution defines marriage as only between a man and a woman. But...
- NRS 122A.200(1)(a) states: Domestic partners have the *same rights, protections and benefits*, and are subject to the same responsibilities, obligations and duties under law, *whether derived from statutes*, administrative regulations, court rules, government policies, common law or any other provisions or sources of law, as are *granted to and imposed upon spouses*.



Alimony - Other Areas of Law

- Taxes
- Bankruptcy
- Others?



The Difficult Part: Explaining it to Clients

- What do you tell a client who asks whether alimony is likely to be awarded?
- What amount do you say is likely to be awarded?
- How long will the alimony obligation last?

Discussion about Alimony

- Questions?
- Handout of Alimony Cases



Attorney's Fees

Overview:

- Statutory Bases for Awards
- Case Law Bases for Awards

Attorney's Fees in All Family Law Cases

Statutes and Rules:

NRS 18.010 – Prevailing Party

EDCR 7.60(b) – Sanctions for Misconduct or Bad Faith Actions

NRCP 11 – Sanctions for Misconduct



Attorney's Fees in All Family Law Cases

Brunzell Factors:

Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455 P.2d 31(1969).

(1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill; (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the result: whether the attorney was successful and what benefits were derived

Id. at 349.



Attorney's Fees in All Family Law Cases

Income is Always a Factor:

Miller v. Wilfong, 121 Nev. 619, 119 P.3d 727, (2005).

Family law trial courts must also consider the disparity in income of the parties when awarding fees.

Id. at 623 (citing *Wright v. Osburn*, 114 Nev. 1367, 970 P.2d 1071 (1998)).



Attorney's Fees in Paternity Cases

Paternity Cases

Cases where the parties were never married, have kid(s), but paternity has not been established.

NRS 126.171

In paternity cases, the court may order reasonable fees of counsel, ...to be paid by the parties in proportions and at times determined by the court.



Attorney's Fees in Child Custody Cases

General Custody Cases

The parties were never married, but have kids and paternity has been established.

NRS 125C.250

The court may order reasonable fees of counsel and experts and other costs of the proceeding to be paid in proportions and at times determined by the court.



Attorney's Fees in Child Custody Cases

Custody Cases Involving Military Members

Nevada has adopted the Uniform Deployed Parents Custody and Visitation Act (NRS 125C.0601 – NRS 125C.0693) – went into effect on January 1, 2014.

NRS 125C.0689

If a party has acted in bad faith or intentionally failed to comply with NRS 125C.0601 to 125C.0693, inclusive, or a court order issued under NRS 125C.0601 to 125C.0693, inclusive, the court may assess reasonable attorney's fees and costs of the opposing party and order other appropriate relief.



Attorney's Fees in Divorce Cases

General Award

NRS 125.150(3)

Court may award a reasonable attorney's fee to either party to an action for divorce.



Attorney's Fees in Divorce Cases

Pre-Divorce

NRS 125.040(1)(c)

Court has discretion to award interim fees where necessary to enable the other party to carry on or defend such suit.

Sargeant v. Sargeant

- Equal Footing
- Most common basis for fees in divorce cases.



Attorney's Fees in Divorce Cases

Post-Divorce

Offer of Judgment Pursuant NRS 125.141

- Must make written offer at least 10 days before trial.
- Ask for Decree to be entered on property rights.
- Offer is good for 10 days.
- If rejected, and rejecting party does not do better at trial, court may order:
 - Taxable costs related to adjudication of property rights.
 - Fees from the date of offer, which are related to adjudication of property rights.
 - Prohibit rejecting party from obtaining fees and costs related to adjudication of property rights.
- The offer cannot include any offer related to:
 - Alimony
 - Child Custody
 - Child Support
 - Attorney's Fees
 - Any non-property issue



Attorney's Fees for Alimony Enforcement

Alimony Arrears

NRS 125.180

The court may grant costs and a reasonable attorney's fee when issuing an order related to alimony arrearages.



Attorney's Fees for Child Support Enforcement

Child Support Arrears

NRS 125B.140(c)

When issuing an order to enforce an existing child support obligation *the court shall determine and include in its order* a reasonable attorney's fee for the proceeding, unless the court finds that the responsible parent would experience an undue hardship if required to pay such amounts.



Attorney's Fees – Attorney Lien

Attorney's Lien – Not Family Law Specific

NRS 18.015

- Attorney automatically has a lien on any file or property left by client in possession of attorney.
- The lien is for the amount of any fee which has been agreed upon by the attorney and client or a reasonable amount if no agreement.
- Perfection of the lien is accomplished by serving notice in writing by certified mail, return receipt upon client and other party (if applicable).



QUESTIONS?

- Pro Bono Case – LACSN has great resources.
- You can always contact me if you have questions in a family law case:

Jack W. Fleeman at Pecos Law Group
jack@pecoslawgroup.com



NEVADA SPOUSAL SUPPORT CASES

Johnson v. Steel, Inc., 94 Nev. 483, 581 P.2d 860 (1978) (Abuse of Discretion)
Smith v. Smith, 94 Nev. 249, 578 P.2d 319 (1978) (Abuse of Discretion)
Cunningham v. Cunningham, 61 Nev. 93, 116 P.2d 188 (1941) (Adequacy)
Wilson v. Wilson, 66 Nev. 405, 212 P.2d 1066 (1949) (Adequacy)
Martin v. Martin, 108 Nev. 384, 832 P.2d 390 (1992) (Bankruptcy as basis for modification)
Siragusa v. Siragusa, 108 Nev. 987, 843 P.2d 807 (1992) (Bankruptcy as basis for modification)(extension)
Allen v. Allen, 112 Nev. 1230, 925 P.2d 503 (1996) (Bankruptcy as basis for modification)
Watson v. Watson, 95 Nev. 495, 596 P.2d 507 (1979) (Cohabitation)
Gilman v. Gilman, 114 Nev. 416, 956 P.2d 761 (1998) (Cohabitation) (Termination)
Spector v. Spector, 112 Nev. 1395, 929 P.2d 964 (1996) (Cohabitation)(Termination)
Schryver v. Schryver, 108 Nev. 190, 826 P.2d 569 (1992) (Extension) (Property Equalization is not a support substitute)
Lake v. Bender, 18 Nev. 361, 7 P. 74 (1884) (Factors)
Buchanan v. Buchanan, 90 Nev. 209, 523 P.2d 1 (1974) (Factors)
Wilford v. Wilford, 101 Nev. 212, 699 P.2d 105 (1985) (Factors)
Sprenger v. Sprenger, 110 Nev. 855, 878 P.2d 284 (1994) (Factors) (Permanent)
Rodriguez v. Rodriguez, 116 Nev. 993, 13 P.3d 415 (2000) (Factors) (Fault)
Devries v. Gallio, 290 P.3d 260, 128 Nev. Adv. Op. 63 (2012) (Factors)
Krick v. Krick, 76 Nev. 52, 348 P.2d 752 (1960) (Just and equitable)
Winn v. Winn, 86 Nev. 18, 467 P.2d 601 (1970) (Just and equitable)
Gardner v. Gardner, 110 Nev. 1053, 881 P.2d 645 (1994) (Just and equitable)
Kerley v. Kerley, 111 Nev. 462, 893 P.2d 358 (1995) (Just and equitable) (Rehabilitative)
Wright v. Osburn, 114 Nev. 1367, 970 P.2d 1071 (1998) (Just and equitable)
Heim v. Heim, 104 Nev. 605, 763 P.2d 678 (1988) (Fault) (Permanent)
Rutar v. Rutar, 108 Nev. 203, 827 P.2d 829 (1992) (Inadequate award)
Murphy v. Murphy, 64 Nev. 440, 183 P.2d 632 (1947) (Interpreting modification of award)
Jacobs v. Jacobs, 83 Nev. 73, 422 P.2d 1005 (1967) (Lump sum)
Shane v. Shane, 84 Nev. 20, 435 P.2d 753 (1968) (Lump sum)
Fenkell v. Fenkell, 86 Nev. 397, 469 P.2d 701 (1970) (Lump sum)
Sargeant v. Sargeant, 88 Nev. 223, 495 P.2d 618 (1972) (Lump sum)
Kishner v. Kishner, 93 Nev. 220, 562 P.2d 493 (1977) (Lump sum)
Daniel v. Baker, 106 Nev. 412, 794 P.2d 345 (1990) (Lump sum)
Schwartz v. Schwartz, 225 P.3d 1273 (2010) (Lump sum)
Folks v. Folks, 77 Nev. 45, 359 P.2d 92 (1961) (Modification)
Day v. Day, 82 Nev. 317, 417 P.2d 914 (1966) (Modification)
Ballin v. Ballin, 78 Nev. 224, 371 P.2d 32 (1962) (Modification of non-merged property settlement agreement)
Jones v. Jones, 86 Nev. 879, 478 P.2d 148 (1970) (Modification of non-merged property settlement agreement)
Ellett v. Ellett, 94 Nev. 34, 573 P.2d 1179 (1978) (Permanent)
Waltz v. Waltz, 110 Nev. 605, 877 P.2d 501 (1994) (Permanent)
Morris v. Morris, 83 Nev. 412, 432 P.2d 1022 (1967) (Pleading)
Woodruff v. Woodruff, 94 Nev. 1, 573 P.2d 206 (1978) (Pleading)
Forrest v. Forrest, 99 Nev. 602, 668 P.2d 275 (1983) (Pleading)
Folks v. Folks, 77 Nev. 45, 359 P.2d 92 (1961) (Reducing Arrears to Judgment)
Alba v. Alba, 111 Nev. 426, 892 P.2d 574 (1995) (Rehabilitative)
Fick v. Fick, 109 Nev. 458, 851 P.2d 445 (1993) (Rehabilitative)
Fondi v. Fondi, 802 P.2d 1264, 106 Nev. 856 (1990) (Factors) (Rehabilitative)
Sweeney v. Sweeney, 42 Nev. 431, 179 P. 638 (1919) (Right to)
Estin v. Estin, 334 U.S. 451 (1948) (Right to / Ex Parte Divorces)
Freeman v. Freeman, 79 Nev. 33, 378 P.2d 264 (1963) (Right to)
Kraemer v. Kraemer, 79 Nev. 287, 382 P.2d 394 (1963) (Right to)
Farnham v. Farnham, 80 Nev. 180, 391 P.2d 26 (1964) (Right to)
Portnoy v. Portnoy, 81 Nev. 235, 401 P.2d 249 (1965) (Right to)
Ormachea v. Ormachea, 67 Nev. 273, 217 P.2d 355 (1950) (Setting aside separate property)
Lewis v. Lewis, 71 Nev. 301, 289 P.2d 414 (1955) (Setting aside separate property)
Ford v. Ford, 105 Nev. 672, 782 P.2d 1304 (1989) (Tax Consequences)
Foy v. Estate of Smith, 58 Nev. 371, 81 P.2d 1065 (1938) (Termination on Death)
Shank v. Shank, 100 Nev. 695, 691 P.2d 872 (1984) (Termination on Remarriage)
Rosenbaum v. Rosenbaum, 86 Nev. 550, 471 P.2d 254 (1970) (Willful Underemployment)
Williams v. Williams, 120 Nev. 559, 97 P.3d 1124 (2004) (Putative spouse doctrine) (Annulment)