NFLR NEVADA FAMILY LAW REPORT

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Mediation and the Role of the Attorney

by Dara Caplan Marias, Marquis & Aurbach

In the past ten years, Nevada has experienced an unprecedented growth in its population. As more families make Nevada home, so too must Nevada cope with increased litigation of divorce and child custody issues. In response to an ever-growing caseload, our district courts are relying more on mediation programs to assist families in decisions regarding child custody. Because of the increasing importance of this topic, this article will examine the following: (1) the theory of mediation; (2) mediation in Nevada; (3) the efficacy of mediation (4) the role of the attorney in this process.

THE THEORY OF MEDIATION

Mediation is a dispute resolution technique in which the parties create the solution. Unlike an arbitrator or judge, the third-party mediator does not "decide" an outcome and impose it on the participants. Rather, mediation involves the consensual settlement of issues in a dynamic process of discussion and negotiation facilitated by a neutral and impartial third party.

The first characteristic of mediation is that it is *consensual*. Mediation is premised on the concept that both parties choose to participate in the process. Many clients and attorneys question how mediation can be consensual if parties are ordered to attend. The answer is that while a person ordered must go to the mediation, he or she is not obligated to participate in the process, and may terminate it at any time. Further, the end-product of mediation is also consensual. No party is required to agree to any custody arrangement or visitation plan.

Another important aspect of mediation is that the mediator is *neutral*. This means that the mediator is ethically obligated to be impartial as to both the parties and the outcome. The mediator should have no prior relationship with either of the parties. Nor, moreover, should the mediator be invested in any given resolution. Being neutral, however does not mean the mediator is passive. The mediator is obligated to protect the process, i.e., he/she must insure there is a balance of power between the participants which affords each an opportunity to discuss their concerns and solutions. Thus, the mediator will actively control the process by defining the issues, limiting speaking time, and holding separate caucuses.

In its purest form, mediation is *confidential*. This is sometimes referred to as the "closed model" of mediation. Because mediation attempts to resolve all disputed custody and visitation issues, it is fundamentally necessary that each party feel comfortable in disclosing all of their concerns and suggested solutions. This

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IN THIS ISSUE

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NFLR Editor's Column

by Mary Rose Zingale, Editor

A proposal has been made to me that we attempt to get the NFLR out on a bi-monthly basis. I think this is a great idea, however, I need something to get out!

Several of you have been faithful suppliers of articles and this is much appreciated. However, if anyone is interested in having a bi-monthly column on any particular topic, please contact me. I believe there is a possibility of a publication six times a year versus four times a year. This is our Reporter and we should all be willing to exchange ideas and information with each other. Tonopah is wonderful for this exchange, however, reviewing interesting topics and recent case law more than once a year I believe would be helpful.

Let's see if we can't make it a goal to have this publication a valuable current informational product. Get your name in print -supply an article. Please make this the last editor's column that has me groveling for articles...

Proper Application of the Statute of Limitations Cutoff in *McKellar*

It has become apparent from anecdotal accounts from around the state that there is some confusion and uncertainty in the Bar and in some courts as to proper application of the opinion of the Nevada Supreme Court in *McKellar v. McKellar*, 110 Nev. 200, 871 P.2d 296 (1994). This article is intended to set out what the author believes to be the only reasonable interpretation of that case.

McKellar involved interpretation of the 1987 amendment to NRS 125B.050. That amendment, effective July 1, 1987, eliminated the statute of limitations on child support. The case held that the amendment was *not* retroactive, and that any claim filed that was time-barred when brought, under the pre-existing statute, remained time-barred. The six-year limitation of NRS 11.190 applies to preclude recovery of any support that was time-barred at the commencement of an action for child support arrearages.

Unfortunately, this holding has proven difficult for some members of the bench and bar to apply to the facts of individual cases. The opinion contains the following sentence starting at the end of page 2: "the general six-year statute of limitations should control in this case to bar recovery of arrearages accrued more than six years prior to the initiation of this action. . . . NRS 11.190 applies to preclude recovery for any of [claimant's] claims which were time-barred at the commencement of her action."

At least two district courts in this state have, at least temporarily, issued rulings misinterpreting *McKellar* as holding that the 1987 repeal allowed claims back to 1981.

In *McKellar* itself, the claimant brought her claim in 1991, claiming arrears back to 1977. The Court did NOT permit arrears back to 1977, OR to 1981. Instead, the

Court held claims to arrears accruing prior to July 1, 1987, were time-barred IF THEY WERE TIME-BARRED WHEN BROUGHT. It is unfortunate that the opinion did not spell out the dates involved (which might have served to prevent the confusion that has ensued), but the language used makes it apparent that in that case, all arrears accruing before May 8, 1985, were irretrievably lost to the claimant on the day she filed her claim (May 8, 1991).

Every month the child support obligee waited before filing her motion for arrears cut off one additional month of collectible arrears that was beyond the six-year, rear-facing "window" of the statute of limitations. That six-year maximum arrearage ONLY started getting larger once the limitations period was no longer affected by passage of time — i.e., for arrears accruing after July 1, 1987. This has an effect only for arrearage cases more than six years beyond that date — i.e., for arrearage motions filed after July 1, 1993.

The lessons of *McKellar* for real cases are thus simple. The earliest a claim COULD have reached back, if it had been brought on July 1, 1987, is July 1, 1981. For new claims just being brought, little analysis need be done; if the law had not been amended, claimants in 1996 could reach back only to 1990 (i.e., six years). Since the statute of limitations was wiped out as of 1987, however, claims are permitted to reach all the way back to the date of that repeal — July 1, 1987, which is an arrearage window (at this time) of nine years. This appears to be the holding of *McKellar*, and the only logical way of interpreting the Supreme Court's Opinion.

Mediation con't

confidentiality is especially important when an agreement is *not* reached. No participant should be prejudiced for having participated in the process. All matters discussed in mediation are confidential to the session. Further, if the parties are sent for an evaluation, the closed model of mediation would provide that the mediator does not perform the custody evaluation or report to the Court.

The most fundamental concepts inherent in mediation, however, are *empowerment* and *self-determination*. Generally, parties to a child custody dispute have long ago relinquished control of these issues. First, they turn over the reigns of their argument to their attorney, and ultimately, they relinquish the decision-making power to a judge. Mediation reverses this process. In mediation, the power to make decisions that affect one's life is placed back in the hands of the individual. Generally, the attorney is ancillary to the process and merely counsels the party before the session and reviews any agreements reached after the mediation. The process itself, carefully safeguarded by the mediator, empowers each individual to voice their concerns and propose solutions.

MEDIATION IN NEVADA

With the approval of the Eighth Judicial District Court, mediation of child custody matters commenced in Southern Nevada in 1985. Funded locally through the Clark County General Fund, the Family Mediation and Assessment Center ("FMAC") in Las Vegas is governed by EDCR 5.70. Mediation is not mandatory in the Eighth Judicial District, and matters must be referred by a judge. FMAC's services range from mediation, to assessment and evaluation. Because of an extremely high caseload[1] and limited number of specialists, mediation in Southern Nevada is conducted on an open model. This means that the same person serving as a neutral in mediation could later assess and evaluate that case for the judge if mediation is unsuccessful. Parties who voluntarily wish to proceed with mediation prior to court proceedings generally can obtain a referral by stipulating to mediation and submitting the stipulation and order to their assigned judge for signature and referral.

There have been discussions about establishing a mandatory mediation program in Clark County whereby disputed custody issues would mediate prior to any court hearing on custody. This model of service would differ from the current structure of FMAC in that mediations would be strictly confidential, and any later evaluations would be conducted by a separate specialist who was not a party to the mediation. This concept is still in the development stage as of the date of this article.

In Washoe County, mediation is confidential. The Family Mediation Program provides services pursuant to Local Rule 53. Accordingly, all actions which involve a dispute regarding custody, access or visitation. As in Clark County, parties must be referred to mediation by the Court; however, referral is mandatory unless the matter is deemed to be exempt. That is, all actions which involve a dispute regarding child custody, access or visitation must be referred to mediation. WDFCR 53(1)(a). Mediation must take

Articles, Case Summaries Wanted for NFLR

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The Section's publication needs your input and contributions. Please contact an editor to discuss any article topic, critique or book review.

place before the trial on custody issues. WDFCR(1)(b). Parties may mediate with a private mediator, but written notice must be filed with the Court indicating that private mediation will take place, the name of the mediator, and the date set for the first mediation conference. WDFCR 53(5)(a)-(b).

A party who believes their case is inappropriate for mediation may seek an exemption by concurrently filing a motion with the Court with their initial pleading or at a later time if new information is obtained. WDFCR 53(13). Cases where an Order for Protection Against Domestic Violence has been obtained must be referred with an order that includes both an indication of the Protective Order and the corresponding case number. WDFCR 53(12). WDFCR 53(14)(b) details which cases are inappropriate for mediation. The Family Mediation Program maintains policies and procedures for identifying and handling cases where domestic violence is present. Parties are seen separately at the time of the initial mediation to assess the capacity for mediation, and the voluntary aspect of mediation is affirmed.

When parties reach an agreement in mediation, that agreement is prepared as a memorandum of agreement or "aparenting plan". The agreement is given to the parties and counsel for reivew, absent any objection may be submitted to the court for approval. If the case is unsuccessful in mediation the court is advised by memo that the parties did not reach an agreement in mediation. The case may then be subject to an evaluation; however, it will not be performed by the parties' mediator. WDFCR 53(11).

The Fourth Judicial District Court also mandates mediation of contested child custody matters prior to trial. 4JDCR 5(4). Whenever a pleading is filed which "creates or responds to a child custody and/or visitation issue" the pleading must include either a request for Court ordered Mediation and/or Child Advocacy. Alternatively, a statement as to why Mediation and/or Child Advocacy is unnecessary may be filed. 4JDCR 5(4).

"Child Advocacy" is the counterpart to a custody evaluation in the other districts. Child advocates interview the parties and persons with knowledge helpful to making a written recommendation to the Court as to a beneficial child custody and visitation arrangement. See 4JDCR (5)(b).

An interesting aspect to Child Advocacy investigations in the Fourth Judicial District is that once the recommendations are made, parties must give serious consideration as to whether to proceed with a trial. The reason for this is that:

Absent good cause, any party who refuses to accept the terms and conditions contained within the Child Advocate recommendation and who is subsequently unable to obtain relief substantially better than is contained in the recommendation of the Child Advocate, shall be required to pay reasonable attorney fees and costs incurred by the other party following the filing of said recommendation.

4JDCR 5(8).

Therefore, there is a real impetus to resolve a matter in mediation or accept the Child Advocate's recommendation.

THE EFFICACY OF MEDIATION

Based on 1994 statistics, 68% of the 238 cases referred to mediation in Washoe County resolved their issues prior to going to court. Of this amount, 56% created a parenting plan, 4% agreed to leave the current court order in place, and 8% settled their matter during the mediation process.[2] In Clark County, the figures since January, 1996 indicate that 40% of the cases referred for mediation reached a parenting plan.[3]

Mediation of child custody matters can have ancillary benefits. In particular, initial studies of the efficacy of mediation suggest that non-custodial parents who mediated their dispute tend to comply with child support payment more than those who did not mediate.[4] Further, parties who perceived themselves as having participated sufficiently in the decision-making aspects of their divorce report being significantly more satisfied with their divorce agreements, both in terms of their custody and financial arrangements.[5]

In a study conducted by the U.S. Department of Health and Human Services of three mediation programs, participants had the following reactions to mediation:

64% to 85% of both custodial and noncustodial parents agreed that the mediator let them tell their side of the story.

- 52% to 83% said the mediatory kept the discussion on track.
- 55% to 76% felt the mediatory focused on the welfare of the children.
- 8% to 25% felt pressured into an agreement.
- 18% to 28% felt the mediator sided with the other parent.
- 49% to 54% of both custodial and noncustodial parents would favor mandatory mediation.

Another beneficial aspect is that mediation effectively models coparental communication. As parents end their personal relationship, they must learn new ways to communicate about issues involving their children. Frequently, this is very difficult given the emotional issues surrounding their split. The mediation process, however, models problem-solving and communication methods. Coupled with a coparenting education program, mediation can be the first step to teaching effective communication techniques.

THE ROLE OF THE ATTORNEY

Family law attorneys often have mixed feelings about mediation. Contrary to the representation process, attorneys are generally excluded from participating in the actual mediation and are only called upon to review a mediated agreement at the end. Despite limited actual participation, however, attorneys play a vital role in making mediation effective. The following list of "do's" and "dont's" is offered to help attorneys enhance the mediation process for clients.

1. Do explain the process of mediation

Many people are unfamiliar with mediation. They think the mediator is a judge and assume they need to convince the mediator that their position is correct. Attorneys can increase the odds of mediation being successful just by explaining the elements of mediation discussed at the beginning of this article. Attorneys should explain to their clients how the process should work and what they can

expect. For example, it is helpful if a party knows in advance that a mediator may control how much time each party is allowed to speak or that the mediator may hold separate caucuses with each person. Finally, emphasize that the process is consensual, and that neither party is required to "agree" to anything and can terminate the process at any time.

2. Do explain the terminology

Parents need to understand the difference between legal and physical custody. Further, the attorney should explain how a parenting plan is set up and implemented. For example, the attorney might explain that parents need to develop a regular visitation schedule and a holiday/vacation schedule which will supersede the usual visitation arrangement.

3. Don't emphasize avoidance of child support

A time share arrangement will only ultimately be successful if both parties have given careful consideration to their work and social commitments, housing availability, proximity to schools and daycare, and other child-related concerns. A parent who is solely focused on getting "equal" time to avoid a child support obligation may not, in actuality, be able to maintain that arrangement. The result is modification litigation down the road by the de facto primary parent. Therefore, while parents need to be aware that the time share arrangement will impact a child support award, don't make this a focal point for the client.

4. Don't tell your client what arrangement is best

This is one area where your client knows what arrangement will work best given his or her schedule. The most frequent scenario in which this arises is when the attorney perceives the other party to be a danger to the child. Many attorneys tell their clients that they need to require "supervised visitation." Supervised visitation is difficult, and if supervised by an outside party, can be very expensive. It should be required only when there is a serious threat to the well-being of the child. Therefore, if the client presents with concerns about the other parent's ability to parent, explore the root of these concerns with the client and problem solve options (e.g., parenting classes).

5. Don't tell the client what he/she could get in court

The truth is the attorney cannot know what custody structure a given judge would impose under the circumstances. The attorney, alternatively, should make the client aware that a court-imposed parenting plan is the default position. The client should be empowered to take matters into his/her hands and resolve these issues without court intervention. It should be emphasized that the judge does not really know the child at issue, nor is the judge concerned about the client's schedule. Most likely a Court will order something which is not convenient in some way for the client. In essence, focus on the self-determination aspects of mediation.

6. Do illicit from the client his or her concerns and needs vis-a-vis a custody plan

Parents sometimes feel overwhelmed or frightened when they enter a mediation. If the attorney and client have made a list of concerns and needs, the client will feel more prepared and at ease during the session. The list will also provide a good review for the client at the end of a session to make sure all of his/her issues have been addressed.

7. Do teach the client how to use the process effectively

Parents need to know that they can exert control over the process. While generally, clients should be instructed to entrust the mediation process to the mediator, clients need to know that they can request a separate caucus if they feel they are being forced into something, or if they are uncomfortable. Moreover, if a client is uncomfortable with the neutrality of the mediator, said concerns can be addressed with the director of the program after the mediation is ended. In Clark County, the client will be invited to address his/her concerns with the mediator in the presence of the director. In most cases, misunderstandings are resolved and actions are explained; however, in some cases a new mediator will be appointed.

8. Do alert the mediator if there are issues of domestic violence, imbalance of power or if Child Protective Services is involved

The mediator needs to know beforehand whether to employ a special protocol for domestic violence. Under the right circumstances mediated agreements where both parents are pleased with the results can be obtained even where there has been domestic violence. A less noticeable concern, but just as important is the issue of power imbalance. If you know your client to be the type to "give in" easily, or if your client fears the other spouse as the result of emotional abuse, contact the mediator before-hand. In this way, the mediator will be better able to equalize the relative positions of power during the session. Finally, if Child Protective Services is involved, it is essential that the mediation program is notified. Safety is not negotiable, and findings by C.P.S. will supersede any and all plans negotiated by the parents. Mediation will be put on hold until a determination by CPS is made.

9. Do review the agreement and process with your client

The first question the attorney should ask after mediation is whether the client had an opportunity to express his/her concerns and whether the client felt coerced into agreement. Assuming there is no coercion, the next inquiry is whether the agreement reflects what the client thought he/she agreed to. The final and most important question is whether the client can live with this arrangement given his/her schedule and other commitments.

In essence the attorney needs to educate his/her clients about the legal terms and concepts at play as well as the process of mediation. In most cases, the attorney can empower the client to resolve these issues without court intervention.

CONCLUSION

Mediation programs are becoming more and more prevalent across the country and in Nevada. As these programs assume a greater role in our court system, it is essential that family law practitioners educate both themselves and their clients so that attorneys may enhance the quality of their client's experience in this process.[6]

Notes

[1] Since January 1996, FMAC has provided services to over 1,000 families with only 10 specialists.

[2] *See*, Family Mediation Program Statistics for 1993-1994 attached as an Exhibit to the Family Mediation Program Progress Report of the Second Judicial District Court, February 1995.

[3] This statistic was provided by LaDeana Gamble, Director F.M.A.C., as of August 1996.

[4] *See*, Price, David A., et al. (1994). Child Access Demonstration Projects: Final Wave One Report: Executive Summary. Washington, D.C. Office of Child Support Enforcement, U.S. Department of Health and Human Services.

[5] *See*, D'Errico, M. and Elwork, A. (1991). Are self-determined divorce and child custody agreements really better? *Family and Conciliation Courts Review, 29*(2), 104-113.

[6] Special thanks is given to Phil Bushard, D.P.A., LaDeana Gamble, M.S.W./L.S.W., Nancy Knilans, Marshall Willick, Esq. and Mary Rose Zingale, Esq. for their assistance in this article

Child Support and Inflation

Practitioners seeking increases in child support but running into the presumptive ceiling, or "cap," should be aware that an argument is available to them based on the effects of inflation since the child support statute was enacted.

Background for the argument is found in *Lewis v. Hicks*, 108 Nev. 1107, 843 P.2d 828 (1992), an action by a former wife to increase child support. There, the Referee recommended and the trial court affirmed setting support at half of the formula amount, which was reversed by the Nevada Supreme Court after a review of NRS 125B.020, 125B.010, and 125B.080(5), (6), (9).

It is worth noting from *Lewis* the approving citation by the Nevada Supreme Court of the August 1, 1992, Report of the Child Support Statute Review Committee (State Bar of Nevada, Family Law Section, to the Nevada Legislature). That report, assembled by a neutral seven-member panel, was the result of over a year of work and research, and closely examined the competing public policies in child support cases.

The Report includes an extensive discussion of matters concerning application of the presumptive ceiling set out in NRS 125B.070, along with a discussion of *Herz v. Gabler-Herz*, 107 Nev. 117, 808 P.2d 1 (1991), and *Chambers ex rel. Cochran v. Sanderson*, 107 Nev. 846, 822 P.2d 657 (1991). The Report noted several practicalities, among them that "the ceiling is most commonly applied when an Obligor's gross income is not much higher than the cutoff." Report at 17.

Turning to the matter of whether the ceiling **should** apply to particular cases, the Report majority was convinced that the ceiling should not be applied, or at least should be exceeded, when it would interfere with the goal of allowing the children to share in the lifestyle available to the wealthier parent, and that this result was well supported by the existing cases:

> There was . . . some question as to what "basic needs" means, since it could reasonably be interpreted as referring to either an absolute standard correlated to the poverty level, or a relative standard that would be based on the on the standard of living enjoyed by the family. The debate was not resolved because the legislative history does not reflect intent.
>
> The structure of the child support statute appears to be designed to facilitate a child's sharing in the parents' wealth. That is the conclusion reached by the Nevada Supreme Court.
>
> . . . .
>
> *Herz* certainly implies that the primary goal of our child support statute is to ensure that a child shares the standard of living enjoyed by the non-custodial parent. The case does not address the question of "hidden alimony." The elimination of need as a prerequisite for additional support, however, impliedly subordinated any such concern to the desire to allow children to share in the standard of living of the wealthier parent.
>
> . . . .
>
> *Chambers* makes it clear that it is appropriate for a wealthy non-custodial parent to pay more in child support than a less wealthy non-custodial parent. If the court's analysis is correct, then the statute *must* have a "standard of living maintenance" or at least "income sharing" purpose, rather than solely a "meeting of need" purpose, irrespective of the statutory language regarding a child's "basic needs."
>
> Having reached that conclusion, the Committee examined whether the ceiling should be deleted entirely as philosophically inconsistent with maintaining children's standard of living. The Committee unanimously concluded that there is an unavoidable tension between maintenance of a child's standards of living (or at least income sharing) on the one hand, and avoiding subsidization of the former spouse as primary custodian on the other.
>
> A majority of the Committee concluded that "penalizing the child" (by keeping support awards low enough that the former spouse would *not* be substantially subsidized) was the greater evil. A minority

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NFLR JUDGMENT, ORDER, AND SETTLEMENT REPORT FORM

Knowing what is happening at the trial level in Family Law will help all of us to be better practitioners. Please share with the Section what is happening in any case you think is significant, either because it typifies rulings in an area, or appears to be contrary to normal rulings in that area.

CASE NAME: _____ DATE:

PROCEDURAL STATUS: [ ]-Pre-Trial Motion [ ]-Trial/Settlement [ ]-Post-Trial Motion

COUNTY: _____ DEPT./JUDGE: _____ CASE NO.: _____

POINT OF PRIMARY INTEREST: [ ]-Procedure [ ]-Custody [ ]-Visitation
[ ]-Child Support [ ]-Spousal Support/Alimony
[ ]-Property Division [ ]-Other

EXPLANATION/SUMMARY: _____

_____

_____

_____

_____

_____

_____

_____

ATTORNEY(S): PLAINTIFF: _____ DEFENDANT: _____

OTHER RELEVANT PERSONS—EXPERTS/WITNESSES/ETC: _____

_____

WHO ARE YOU?: _____
Name Address Phone

felt that it would be inappropriate to take any action within the bounds of the child support statute that would have the effect of a *de facto* alimony award, even if it was temporary (since measured by the minority of the children).

(Report at 17-19; various deletions denoted above by ellipses.)

In 1992, the Nevada Legislature deadlocked on various political concerns, even after convening a joint session of the Senate and Assembly Judiciary Committees to receive the Report. The question of what the current cases indicate should be done was therefore left to the discretion of the courts.

The Report suggested various approaches that might be used, such as requiring the child support obligor to prove that application of the ceiling would **not** alter the child's standard of living, or ignoring the ceiling once a specific income level was reached; $60,000.00 per year was suggested. Report at 19.

This finally brings us back to the matter of inflation. When the Report was submitted in 1992, inflation had already nibbled away at the ceiling so that "for the ceiling to have the same relative value that it had in 1987 (when the child support statute was enacted), the $500.00 per month per child would have to be increased to $608.35." Report at 17. The cost of living has continued to increase; as of October, 1995, an inflation-adjusted equivalency to the originally-enacted $500.00 was $676.71. That number increases, slowly but inexorably, as time passes.

Practitioners arguing ceiling cases in which the child support amount based on percentage is somewhere near the $500.00 per month ceiling, should consider reminding the Court of the effect of inflation, and requesting a finding that the effect of inflation since enactment of the child support statute constitutes grounds for deviating from the presumptive ceiling under NRS 125B.080(6), at least to the extent of applying the percentage of support set out by the general formula.

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