## Morales-Pabon v. Nightingale, No. 68501, Order of Affirmance (Unpublished Disposition, May 18, 2016) COA unpub

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Appellate courts should not overturn a decision regarding attorney fees in divorce proceedings absent an abuse of discretion by the district court.

Attorney's fees may be awarded if there was frivolous motion practice and thus an unreasonable increase of costs within a case (EDCR 7.60), if the action had no reasonable grounds or was intended to harass a party (NRS 18.010(2)(b)), or if there is a substantial disparity in assets between the parties (Sargeant).