1 IN THE SUPREME COURT OF THE STATE OF NEVADA 2 IN THE MATTER OF THE No. 71873 3 PARENTAL RIGHTS AS TO Dist. Ct. Case No. D-15-510944 Electronically Filed S.L., N.R.B.; H.R.B. AND W.C.B. 4 Jul 06 2017 03:50 p.m. Elizabeth A. Brown 5 DONALD B., Clerk of Supreme Court Appellant, 6 VS. 7 STATE OF NEVADA DEPARTMENT OF FAMILY 9 SERVICES; S.L.; N.R.B.; H.R.B.; AND W.C.B., 10 Respondents. 11 12 MELISSA L., Consolidated with: Appellant, No. 71889 13 Dist. Ct. Case No. D-15-510944 vs. 14 STATE OF NEVADA 15 DEPARTMENT OF FAMILY 16 SERVICES; S.L.; N.R.B.; H.R.B.; AND W.C.B., 17 Respondents. 18 19 RESPONDENT S.L.'S NRAP 26.1 DISCLOSURE AND 20 JOINDER TO ANSWERING BRIEF 21 22 LEGAL AID CENTER 23

OF SOUTHERN NEVADA, INC.

CHILDREN'S ATTORNEYS PROJECT

AMY B. HONODEL, ESQ.

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Attorney for Respondent, S.L. 28

NRAP 26.1 DISCLOSURE

The undersigned counsel of record for Respondent, S.L., certifies that the following are persons and entities as described in NRAP 26.1(a), and must be disclosed. These representations are made in order that the judges of this court may evaluate possible disqualification or recusal:

S.L. is an individual, unmarried person.

Amy B. Honodel, Esq., the undersigned, is a staff attorney with Legal Aid Center of Southern Nevada, Inc. (LACSN), a private, non-profit Nevada corporation. LACSN does not have a parent corporation, nor has it issued stock. The undersigned represented S.L. in District Court Case No. D-15-510944-R and District Court Case No. J-14-319202-P2.

JOINDER TO ANSWERING BRIEF FILED BY

CLARK COUNTY DEPARTMENT OF FAMILY SERVICES

Respondent, S.L., through her counsel undersigned, hereby joins the Answering Brief submitted by the Clark County District Attorney on behalf of the Department of Family Services in this matter. S.L. adopts the Statement of Facts and Arguments presented by the Department of Family Services as though fully set forth in this document. S.L. requests this Court affirm and uphold the district court's order below, which found clear and convince evidence of factual bases to terminate Appellants' parental rights.

Respectfully submitted this 5th day of July, 2017.

LEGAL AID CENTER OF SOUTHERN NEVADA, INC. CHILDREN'S ATTORNEYS PROJECT

By: <u>/s/ Amy B. Honodel</u> AMY B. HONODEL, ESQ. Nevada Bar No. 7755 725 East Charleston Boulevard Las Vegas, Nevada 89104 Phone: (702) 386-1070, Ext. 1492

CERTIFICATE OF COMPLIANCE

- 1. I hereby certify that this Response complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5), and the type style requirements of NRAP 32(a)(6) because this Response has been prepared in a proportionally spaced typeface using Microsoft Word in a14 point Times New Roman font.
- 2. I further certify that this Response complies with any page limitations found in the Nevada Rules of Appellate Procedure.
- 3. Finally, I hereby certify that I have read this Response, and to the best of my knowledge, information and belief, it is not frivolous or interposed for any improper purpose. I further certify that this Response complies with all applicable Nevada Rules of Appellate Procedure.

DATED this 5th day of July, 2017.

LEGAL AID CENTER OF SOUTHERN NEVADA, INC. CHILDREN'S ATTORNEYS PROJECT

By: /s/ Amy B. Honodel AMY B. HONODEL, ESQ. Nevada Bar No. 7755 725 East Charleston Boulevard Las Vegas, Nevada 89104 Phone: (702) 386-1070, Ext. 1492

1 **CERTIFICATE OF SERVICE** 2 I hereby certify and affirm that I mailed a copy of the foregoing 3 RESPONDENT S.L.'S NRAP 26.1 DISCLOSURE AND JOINDER TO 4 5 ANSWERING BRIEF to the attorneys of record below by depositing same for 6 mailing in the United States mail, postage prepaid, and/or by electronic mail to 7 the addresses listed below on the 5th day of July, 2017. 8 9 ROBERT M. DRASKOVICH, ESQ. MICHAEL I. GOWDEY, ESQ. 10 Nevada Bar No. 6275 Nevada Bar No. 6994 Turco & Draskovich, LLP Law Offices of Michael I. Gowdey 11 815 S. Casino Center Blvd 815 S. Casino Center Blvd 12 Las Vegas, NV 89101 Las Vegas, NV 89101 Robert@Draskovich.com mgowdey@aol.com 13 Attorney for Appellant, Attorney for Appellant, 14 Donald Brown Melissa Lawrence 15 STEVEN B. WOLFSON, ESQ. LAUREN D. CALVERT, ESO. 16 Nevada Bar No. 10534 CLARK COUNTY DISTRICT Bighorn Law **ATTORNEY** 17 716 S. Jones Boulevard Nevada Bar No. 1565 18 Las Vegas, NV 89107 JANNE M. HANRAHAN, ESQ. lauren@morrisandersonlaw.com Nevada Bar No. 9053 19 Attorney for Respondents, N.R.B., AMITY C. DORMAN, ESQ. 20 H.R.B., and W.C.B. Nevada Bar No. 9316 21 601 N. Pecos Road Las Vegas, NV 89101 22 Janne.Hanrahan@ClarkCountyNV.gov 23 Amity.Dorman@ClarkCountyNV.gov Attorney for Respondent, 24 Department of Family Services 25

/s/ Amy Honodel

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An employee of Legal Aid Center of Southern Nevada, Inc.