

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 IN THE MATTER OF THE
3 PARENTAL RIGHTS AS TO S.L.;
4 N.R.B.; H.R.B. AND W.C.B.

Case No. 71873

Electronically Filed
Oct 18 2017 09:19 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

5 DONALD B.,
6 Appellant,

7 vs.

8 STATE OF NEVADA
9 DEPARTMENT OF FAMILY
10 SERVICES; S.L.; N.R.B.;
11 H.R.B.; AND W.C.B., MINORS,
 Respondents.

12 IN THE MATTER OF THE
13 PARENTAL RIGHTS AS TO S.L.;
14 N.R.B.; H.R.B. AND W.C.B.

Case No. 71889

15 MELISSA L.,
16 Appellant,

17 vs.

18 STATE OF NEVADA
19 DEPARTMENT OF FAMILY
20 SERVICES; S.L.; N.R.B.; H.R.B.;
21 AND W.C.B., MINORS,
 Respondents.

22 **RESPONDENTS N.R.B., H.R.B. AND W.C.B.'s ANSWERING BRIEF**
23 **AND JOINDER TO APPELLANTS' PETITION FOR REVIEW**

24 **LAUREN CALVERT, ESQ.**

25 Nevada Bar No. 10534

26 MORRIS ANDERSON

27 716 S. Jones Blvd.

28 Las Vegas, Nevada 89107

Telephone: (702) 333-1111

Attorneys for Respondents N.R.B., H.R.B., and W.C.B.

Pursuant NRAP 28(i), Briefs in a Case Involving Multiple Appellants or Respondents,

In a case involving more than one appellant or respondent, including consolidated cases, any number of appellants or respondents may join in a single brief, and any party may adopt by reference a part of another's brief. Parties may similarly join in reply briefs.

Respondents N.R.B., H.R.B., and W.C.B., by and through their counsel of record, as and for their Answering Brief, hereby join in Appellants' Joint Opening Brief. Respondents N.R.B., H.R.B., and W.C.B. supports Appellants in this appeal and concurs with the legal arguments, points and authorities as presented in the Joint Opening Brief. For the reasons set forth in Appellants' Joint Opening Brief, it is respectfully prayed by Respondents N.R.B., H.R.B., and W.C.B. that this Honorable Court overturn the District Court's decision terminating Appellants' parental rights.

DATED this 17th day of October, 2017.

MORRIS ANDERSON

By: /s/ Lauren Calvert
LAUREN CALVERT, ESQ.
Nevada Bar No. 10534
716 S. Jones Blvd.
Las Vegas, Nevada 89107

*Attorneys for Respondents N.R.B., H.R.B., and
W.C.B.*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

- 2
- 3
- 4
- 5

6
7

8
9
10
11
12

13
14

15
16
17
18
19
20

21
22
23
24
25
26

27
28

1 to the best of my knowledge, information, and belief, it is not frivolous or interposed
2 for any improper purpose. I further certify that this brief complies with all applicable
3 Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which requires
4 every assertion in the brief regarding matters in the record to be supported by a
5 reference to the page of the transcript or appendix where the matter relied on is to be
6 found. I understand that I may be subject to sanctions in the event that the
7 accompanying answer is not in conformity with the requirements of the Nevada Rules
8 of Appellate Procedure.
9
10
11

12 DATED this 17th day of October, 2017.

13 **MORRIS ANDERSON**

14
15 By: /s/ Lauren Calvert
16 **LAUREN CALVERT, ESQ.**
17 Nevada Bar No. 10534
18 716 S. Jones Blvd.
19 Las Vegas, Nevada 89107
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

STEVEN WOLFSON
District Attorney

AMY HONODEL
Legal Aid Center of Southern Nevada
Attorney for S.L.

ROBERT M. DRASKOVICH, ESQ.
Attorney for Appellant Donald Brown

MICHAEL GOWDEY, ESQ.
Attorney for Appellant Melissa Brown

17
18
19
20
21
22
23
24
25
26
27
28