

**In the Supreme Court of Nevada**

In Re: Parental Rights  
as to L.L.S., a Minor.

TAHJA LUJAN,

Appellant,

*vs.*

STATE OF NEVADA DEPARTMENT  
OF FAMILY SERVICES; and L.L.S.,

Respondents.

Electronically Filed  
Dec 11 2019 05:53 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF**

The minor child L.L.S. requests an extension through January 13, 2020, to file her answering brief. NRAP 31(b)(3). This is the second such motion. The previous request was granted in full. The brief would otherwise be due December 12, 2019.

Although the brief is nearly complete, the minor child's *pro bono* counsel need this extension. *Pro bono* counsel have not had an opportunity to discuss the brief with CAP counsel at the Legal Aid Center of Southern Nevada. The principal legal question—whether a hearing master has authority to hear and make recommendations on a motion to terminate parental rights under NRS chapter 432B—is extraordinarily important, as it affects dozens of Nevada families. And while *pro*

*bono* counsel are familiar with that issue, they are not as familiar with the issues affecting the substantive correctness of the order terminating parental rights. The requested extension will help counsel to streamline these issues on appeal.

In addition, while counsel's caseload is not, without more, a reason to extend the answering brief deadline, *pro bono* counsel have faced extraordinary deadline pressures in other cases as a result of work that had to be put off during counsel's illnesses. Lead *pro bono* counsel is also arguing an appeal before this Court on December 12, the current deadline for this brief.

*Pro bono* counsel appreciate the Court's courtesy in considering this request.

Dated this 11th day of December, 2019.

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**CERTIFICATE OF SERVICE**

I certify that on December 11, 2019, I submitted the foregoing  
“Motion for Extension of Time to File Answering Brief” for filing via the  
Court’s eFlex electronic filing system. Electronic notification will be  
sent to the following:

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