

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

2 In the Matter of the Guardianship of the
3 Person and Estate of

4 KATHLEEN JUNE JONES,
5 Adult Protected Person.

Supreme Court No. 81414

District Court Case No. G-19-052263-
A Electronically Filed
 Jan 19 2021 05:02 p.m.
 Elizabeth A. Brown
 Clerk of Supreme Court

6 RODNEY GERALD YEOMAN,
7 Appellant,

8 vs.

9 KIMBERLY JONES; AND
10 KATHLEEN JUNE JONES, A
11 PROTECTED PERSON,
 Respondents.

12 **MOTION FOR EXTENSION OF TIME REGARDING RESPONDENTS'**
13 **MOTION TO DISMISS APPEAL**

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6 Attorneys for Rodney Gerald Yeoman

7 Appellant Rodney Gerald Yeoman (“Gerry”) by and through his counsel of
8 record does hereby file this Motion for Extension of Time Regarding
9 Respondents’ Motion to Dismiss Appeal. This motion is brought pursuant to
10 N.R.A.P. 31.

11 Respondents’ filed a Motion to Dismiss Appeal on December 28, 2020
12 (“Motion to Dismiss”). The response to the Motion to Dismiss was due January 5,
13 2021. Appellant obtained a telephonic extension for the response on January 5,
14 2021, setting the new response date as today, January 19, 2021.

15 On December 22, 2020, Appellant filed a Motion for Extension of Time
16 Regarding Substitution of a Personal Representative to provide adequate time to
17 obtain a special administrator for the deceased Appellant. With the holidays, it
18 was anticipated that the 14-day telephonic extension would provide the Court time
19 to rule upon the Motion for Extension of Time Regarding Substitution of a
20 Personal Representative. However, no order has yet been entered regarding filing
21 of the substitution of a personal representative. Thus, it appears that technically
22 there is no current party capable of responding to the Motion to Dismiss.
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1 Letters of special administration were entered in probate for Appellant on
2 January 11, 2021, and so it is now possible to file the substitution of party once
3 this Court rules upon the December 22, 2020 Motion for Extension of Time
4 Regarding Substitution of a Personal Representative.

5
6 One previous telephonic extension for filing a response to the Motion to
7 Dismiss was obtained herein. No other extensions have been received related to
8 the Motion to Dismiss.

9
10 No previous requests for extensions by Gerry have been denied.

11
12 Gerry requests a 10-day extension, beyond 1) this Court's anticipated ruling
13 on the Motion for Extension of Time Regarding Substitution of a Personal
14 Representative and 2) the subsequent ruling on the motion to substitute a personal
15 representative, to file the response to the Motion to Dismiss.

16
17 Gerry suggests there is no material prejudice to Respondent herein.

18
19 Dated this 19th day of January, 2021.

20 KEHOE & ASSOCIATES

21 /s/ Ty Kehoe

22 Ty E. Kehoe, Esq.

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1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 19th day of January, 2021, I served a true
3 and correct copy of the Motion for Extension of Time Regarding Respondents'
4 Motion to Dismiss Appeal, via electronic service to the following, or via US First
5 Class Mail postage pre-paid to the addresses listed:
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7 All parties on Court e-service system.
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9
10 /s/ Ty Kehoe
11 Ty E. Kehoe
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