

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2 IN THE MATTER OF THE GUARDSHIP OF  
3 K. M. S., MINOR.

4 K. A. S.,

5 Appellants,

6 vs.

7 STATE OF NEVADA DEPARTMENT OF FAMILY  
8 SERVICES; AND A. C.,  
9 Respondents.

Electronically Filed  
Oct 01 2021 03:15 p.m.  
Elizabeth A. Brown  
Clerk of the Supreme Court  
Case No. 81946

10 MOTION FOR EXTENSION OF TIME TO FILE REPLY

11 COMES NOW, the State of Nevada by STEVEN B. WOLFSON, District  
12 Attorney, through his Chief Deputy District Attorney FELICIA QUINLAN, and hereby  
13 moves this Honorable Court for an order granting an extension of time of 10 days from  
14 today.

15 This motion is made and based upon NRAP 27 and 31(a)(2), the Affidavit of  
16 Chief Deputy District Attorney FELICIA QUINLAN filed herewith, and the Points and  
17 Authorities attached hereto.

18 DATED this 28<sup>th</sup> day of September, 2021.

19  
20 Respectfully submitted,

21 STEVEN B. WOLFSON  
22 Clark County District Attorney

23  
24 BY



25 FELICIA QUINLAN  
26 Chief Deputy District Attorney  
27 Nevada Bar No. 11690  
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**POINTS AND AUTHORITIES**

Pursuant to NRAP 26(b), this Court for good cause shown can enlarge the time prescribed by the Nevada Rules of Appellate Procedure for doing any act, or may permit an act to be done after the expiration of such time.

As good cause for the extension, the State cites that the Order Granting Motion to Withdraw was electronically filed on August 27, 2021. Unfortunately, the undersigned deputy did not receive this Court’s Order until September 28, 2021. Therefore, Counsel for the State requests an extension to appropriately respond to all of appellant’s arguments.

The State respectfully moves for an enlargement of time of ten (10) days within which to file a fast track response. This will give the State sufficient time to thoroughly review the record so that it can properly respond to the material. This is the State’s first request for an extension of time to file the fast track response and is not made for the purpose of delay but rather to have an opportunity to prepare a thorough reply.

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1 **CONCLUSION**

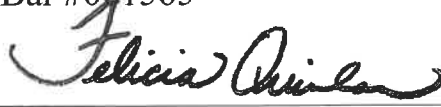
2 Therefore, the undersigned respectfully requests that this Honorable Court grant  
3 an extension of ten (10) days within which to file a reply.

4 DATED this 28<sup>th</sup> day of September 2021.

5  
6 Respectfully submitted,

7 STEVEN B. WOLFSON  
8 Clark County District Attorney  
9 Nevada Bar #001565

10 BY

  
11 FELICIA QUINLAN  
12 Chief Deputy District Attorney  
13 Nevada Bar No. 11690  
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**AFFIDAVIT OF FELICIA QUINLAN**  
**IN SUPPORT OF MOTION FOR EXTENSION OF TIME**

I, FELICIA QUINLAN, being first duly sworn deposes and says:

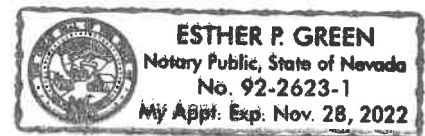
1. I am an attorney duly licensed to practice law in the State of Nevada. As a Chief Deputy District Attorney, I am counsel for the State in the above-entitled matter; I have personal knowledge of all matters contained herein and am competent to testify thereto.
2. The State's reply is due in the Supreme Court on September 17, 2021.
3. Affiant received the Order Granting Motion to Withdraw on September 28, 2021.
4. Affiant is requesting continuance of ten (10) days to file the fast track response. This Motion is made in good faith and not for the purpose of delay.

Further Your Affiant Sayeth Naught.

DATED this 28<sup>th</sup> day of September 2021.

  
FELICIA QUINLAN

SUBSCRIBED and SWORN to before me  
this 28<sup>th</sup> day of September, 2021.




  
\_\_\_\_\_  
NOTARY PUBLIC in and for said  
County and State

1 **CERTIFICATE OF MAILING**

2 I hereby certify that service of the **MOTION FOR EXTENSION OF TIME**  
3 **TO FILE REPLY** was made this 28<sup>th</sup> day of September, 2021, by depositing a copy  
4 in the U.S. Mail, postage pre-paid and addressed to the following:

5 Asha Colson Children's Attorney Project  
6 c/o Law Office of Africa A. Sanchez, Legal Aid Center of S. NV  
7 Esq. LLC 725 E. Charleston Blvd.  
8 3211 N. Tenaya Way #119 Las Vegas, NV 89104  
9 Las Vegas, NV 89129

10 Kwame Anir Saafir  
11 1027 S. Rainbow Blvd. #337  
12 Las Vegas, Nevada 89145

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14 Clark County District Attorney's Office,  
15 Juvenile Division  
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