

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 18 2021 05:20 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No. 81946

10 MOTION FOR EXTENSION OF TIME TO FILE REPLY

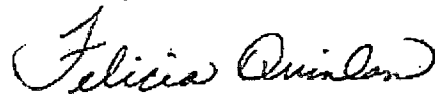
11 COMES NOW, the State of Nevada by STEVEN B. WOLFSON, District
12 Attorney, through his Chief Deputy District Attorney FELICIA QUINLAN, and hereby
13 moves this Honorable Court for an order granting an extension of time to file a reply.

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

17 DATED this 18th day of October, 2021.

18 Respectfully submitted,
19 STEVEN B. WOLFSON
Clark County District Attorney

20 BY



21 FELICIA QUINLAN
Chief Deputy District Attorney
Nevada Bar No. 11690

1 POINTS AND AUTHORITIES

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

5 As good cause for the extension, the State cites that the Order Granting Motion
6 to Withdraw was electronically filed on August 27, 2021. Unfortunately, the
7 undersigned deputy did not receive this Court's Order until September 28, 2021.
8 Counsel then requested an extension to respond but that was rejected as Counsel was
9 not on record for this case. Thereafter, Counsel filed a Notice of Appearance and refiled
10 the motion for extension of time.

11 The undersigned counsel then waited for a response from this Honorable Court
12 before filing another document with the Court. Because the first document filed was
13 rejected, undersigned counsel believed that this Court needed to grant permission for
14 the fast track statement to be accepted.

15 Thereafter, the motion was denied because the response was not filed. The State
16 respectfully moves for an enlargement of time to allow undersigned counsel to file a
17 fast track response. This will give the State an opportunity to be heard regarding the
18 claims made in the fast track statement. It was a simple misunderstanding that the fast
19 track response was not already filed. This request is not made for the purpose of delay
20 but rather to have an opportunity to have the issues decided on their merits.

21 ...

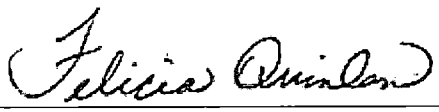
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

CONCLUSION

Therefore, the undersigned respectfully requests that this Honorable Court grant
an extension of time within which to file a reply.

DATED this 18th day of October, 2021.

Respectfully submitted,
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY 
FELICIA QUINLAN
Chief Deputy District Attorney
Nevada Bar No. 11690

...
...
...
...
...
...
...
...
...
...

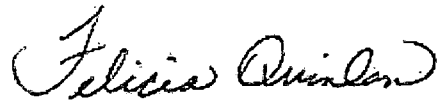
AFFIDAVIT OF FELICIA QUINLAN
IN SUPPORT OF MOTION FOR EXTENSION OF TIME

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 was due in the Supreme Court on September 17, 2021.
3. Affiant received the Order Granting Motion to Withdraw on September 28, 2021.
4. Affiant filed a motion to extend time to file a reply and waited for this Court to respond before filing the response.
5. Affiant is requesting continuance 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.

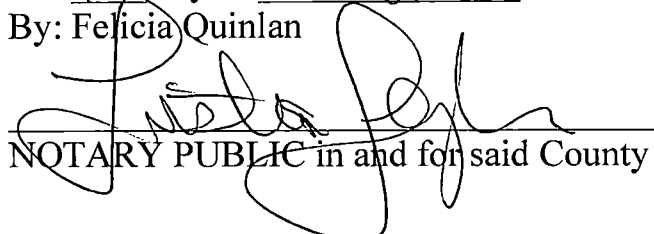
DATED this 18th day of October 2021.

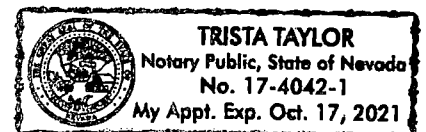


FELICIA QUINLAN

SUBSCRIBED and SWORN to before me
this 18th day of October 2021.

By: Felicia Quinlan


NOTARY PUBLIC in and for said County and State



- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21

Asha Colson
Law Office of Africa A. Sanchez, Esq. LLC
3211 N. Tenaya Way #119
Las Vegas, NV 89129

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

Clark County District Attorney's Office
Juvenile Division