

IN THE SUPREME COURT FOR THE STATE OF NEVADA

Jeffrey Reed, <p style="text-align: center;">Petitioner,</p> vs. Alecia Reed nka Draper and Alicia Draper, as Conservator for Emily Reed, <p style="text-align: center;">Respondent.</p>	Supreme Court #: 82575 District Court Case #: 051238688 ELECTRONICALLY FILED Oct 06 2021 12:16 p.m. Elizabeth A. Brown Clerk of Supreme Court RESPONDENT’S <u>COMBINED</u> OPPOSITION TO APPELLANT’S MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND OPPOSITION TO APPELLANT’S MOTION TO EXTEND TIME TO FILE REQUEST FOR TRANSCRIPTS
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RESPONDENT’S COMBINED OPPOSITION TO APPELLANT’S MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND OPPOSITION TO APPELLANT’S MOTION TO EXTEND TIME TO FILE REQUEST FOR TRANSCRIPTS

Respondent, Alecia Draper, as Conservator for Emily Reed (“Emily”), respectfully opposes two motions recently filed by Appellant, namely Appellant’s Motion to Extend time to File Opening Brief and Appellant’s Motion to Extend Time to File Request for Transcripts (“Appellant’s Motions”) for the following reasons:

Appellant’s Motions should be denied and his frivolous appeal should be dismissed due to Appellant’s failure to comply with the deadlines ordered by the Nevada Supreme Court as show below:

- (1) Pursuant to this Court’s July 1, 2021 Order Reinstating Briefing, Appellant was ordered to file a request for the district court transcripts form on or before July 15, 2021. Appellant failed to comply with this deadline. Instead, Appellant attempted to file said transcript form on September 29, 2021, but it was rejected by the clerk as untimely because it was filed 76 days or 2 months and 14 days late! Thereafter, on September 30, 2021,

Appellant filed his Motion to Extend Time To File Request for Transcripts, which Motion was filed months past the deadline!

(2) Pursuant to this Court's July 1, 2021 Order Reinstating Briefing, Appellant was ordered to file his Opening Brief on or before September 29, 2021. Appellant failed to comply with this deadline as well. Instead, Appellant waited a full 90 days and on the very last day to file his brief, namely September 29, 2021, he filed his motion to extend the deadline.

Appellant's pattern of delay and not complying with court orders extends to the District Court. In fact, while this case has been pending on appeal, the parties had to appear before the District Court Judge solely due to Appellant's refusal to comply with his court ordered child support obligation for Emily! In addition, contrary to the erroneous and unsupported statement in Appellant's Motion to Extend Time To File Opening Brief, Appellant has presented no proof that he is "struggling financially due to health related issues and the COVID-19 pandemic." In fact, this unsubstantiated self-serving statement by Appellant's counsel is nothing more than a red herring, which the District Court rejected in Appellant's most recent attempt to explain his refusal to comply with the District Court's order to support Emily! Furthermore, contrary to the statement in Appellant's motion, there never was any chance of this appeal settling following the Supreme Court Settlement Conference. Sadly, all that has been made clear is that Appellant doesn't want to properly support his severely disabled daughter Emily and doesn't want to ensure that she gets the support that she desperately needs on a monthly basis to keep her as stable as possible!

Given the foregoing, it is clear that Appellant's plan is DELAY; however, this delay plan **is contrary to the health and well-being and best interest of Emily Reed ("Emily"). Emily desperately needs the court ordered support on a monthly basis to get her required medical treatment and to survive!**

Emily is a 24-year-old disabled girl with expenses averaging almost \$6,000 per month! Emily was repeatedly sexually molested for over 8 (eight) years as a minor after the parties divorced. Emily's current diagnosis is Dissociative Identity Disorder, Major Depressive Disorder, Recurrent, Severe without Psychosis; Chronic Post Traumatic Stress Disorder. Emily has attempted suicide a large number of times, including when she was a minor. Emily has been in and out of treatment facilities. **Emily has approximately 60 different personalities aka alters,** making her life very challenging to say the least.

No further delay can be tolerated!

Appellant's Motions should be denied and this frivolous appeal should be dismissed, with Appellant paying Respondent's attorney's fees.

BRENNAN LAW FIRM, LLC

/s/ Elizabeth Brennan

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*Attorney for Respondent, Emily Reed,
through her Conservator Alecia Draper*

CERTIFICATE OF SERVICE

I certify that I am an employee of Brennan Law Firm and that on this 7th day of October, 2021 service of the foregoing:

**RESPONDENT'S COMBINED OPPOSITION TO APPELLANT'S
MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND
OPPOSITION TO APPELLANT'S MOTION TO EXTEND TIME TO FILE
REQUEST FOR TRANSCRIPTS**

mandatory electronic service through the Eighth Judicial District Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

Amanda M. Roberts, Esq.
Attorney for Jeffery Allen Reed

/s/ Elizabeth Brennan

An Employee of BRENNAN LAW FIRM