

IN THE SUPREME COURT OF NEVADA

IN THE MATTER OF THE GUARDIANSHIP
OF THE PERSON AND ESTATE OF
KATHLEEN JUNE JONES, AN ADULT
PROTECTED PERSON.

KATHLEEN JUNE JONES,

Appellant,

vs.

ROBYN FREEDMAN; AND DONNA
SIMMONS,

Respondents.

Electronically Filed
Oct 19 2020 03:21 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE DOCKETING
STATEMENT**

Appellant Kathleen June Jones, by her undersigned counsel, hereby moves this Court for an extension to file her docketing statement pursuant to NRAP 14 until five (5) days from the date of the Order granting this Motion.

1. Appellant filed her Notice of Appeal on September 17, 2020. Pursuant to Nevada Rules of Civil Procedure 14(b), Appellant was required to file the Docketing Statement within 21 days of docketing of the appeal. At the end of September 2020, the undersigned counsel

accepted this matter from Legal Aid Center of Southern Nevada, and in the process of the placement and transition, the undersigned counsel did not properly calendar the due date for the docketing statement. (A supporting declaration by the undersigned is being submitted herewith.)

2. The undersigned counsel filed the docketing statement on October 15, 2020, and it was rejected later that day as untimely.

3. In the meantime, Appellant, represented by the undersigned, has been participating in good faith in the Court's settlement program, including by attending a settlement conference on October 16, 2020.

4. Pursuant to Rule 14(d), Appellant submits that good cause exists for Appellant to be permitted to file the docketing statement and have it be deemed timely. The docketing statement became due for filing in the midst of the transition of the case between counsel for Appellant, and the deadline was inadvertently missed as a result of the transition process. This Appeal is at its inception, and Appellant made an attempt to file the docketing statement only approximately one-week beyond its due date. Given this short delay, together with the nature of

the docketing statement as a means for the Court to address procedural rather than substantive matters, *see* Rule 14(a)(3), no prejudice will result to any other party to this Appeal if the docketing statement is permitted to be filed now.

Dated: October 19, 2020

BALLARD SPAHR LLP

By: /s/ Joel E. Tasca
JOEL E. TASCA, ESQ.
NEVADA BAR NO. 14124
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

Attorney for Appellant

CERTIFICATE OF SERVICE

I certify that on October 19, 2020, I submitted the foregoing
**MOTION FOR EXTENSION OF TIME TO FILE DOCKETING
STATEMENT** for filing through the Court's electronic filing system.

Electronic notification of service will be sent to the following:

Patrick C. McDonnell, Esq.	Jeffrey R. Sylvester, Esq.
John P. Michaelson, Esq.	SYLVESTER & POLEDNAK, LTD.
MICHAELSON & ASSOCIATES, LTD.	1731 Village Center Circle
2200 Paseo Verde Parkway	Las Vegas, Nevada 89134
Suite 160	
Henderson, Nevada 89052	<i>Attorneys for Respondents</i>

Attorneys for Respondents

I further certify that on October 19, 2020, I served a copy of this
document by mailing a true and correct copy thereof, postage prepared,
to the following:

Lansford W. Levitt, Esq.
SETTLEMENT JUDGE
4230 Christy Way
Reno, Nevada 89519

/s/ Adam Crawford
An employee of Ballard Spahr LLP

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DECLARATION OF JOEL E. TASCA

I, Joel E. Tasca, hereby declare as follows:

1. I have been retained as *pro bono* appellate counsel for appellant Kathleen June Jones through the Legal Aid Center of Southern Nevada. I make this declaration based on personal knowledge.
2. At the end of September 2020, I accepted this matter from Legal Aid Center of Southern Nevada, and in the process of the placement and transition, I did not properly calendar the due date for the docketing statement.

3. I filed the docketing statement on October 15, 2020, and it was rejected later that day as untimely.
4. The docketing statement became due for filing in the midst of the transition of the case to me, and the deadline was inadvertently missed as a result of the transition process.
5. On behalf of Appellant, I attended the settlement conference in this matter on October 16, 2020.

Executed this 19th day of October, 2020.

/s/ Joel E. Tasca
Joel E. Tasca