

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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

Case No.: 81799

Electronically Filed  
Mar 22 2021 11:38 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

KATHLEEN JUNE JONES,

Appellant,

vs.

ROBYN FRIEDMAN; AND DONNA  
SIMMONS,

Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE**  
**RESPONDENTS' ANSWERING BRIEF**  
**(First Request)**

Respondents, Robyn Friedman and Donna Simmons ("Respondents"), by and through their counsel of record, respectfully moves this Honorable Court, pursuant to NRAP 31(b), for an extension of 45 days in which to file Respondents' answering brief.

Respondents' answering brief is currently due March 22, 2021. This is Respondents' first motion for an extension of time. Respondents' answering brief was originally due March 22, 2021. If this Court grants this request for an extension

of 45 days, Respondents' answering brief will be due Thursday, May 6, 2021. Pursuant to Rule 26, "[f]or good cause, the court may extend the time prescribed by these Rules or by its order to perform any act. . . ." NRAP 26(b)(1)(A).

Good cause exists to grant the requested extension for the following reason:

1. Mr. Echols has been heavily involved in both motion practice and related pretrial proceedings in Clark County Nevada, District Court in *Giacalone v. MedicWest Ambulance, Inc. et al.*, Case No. A-15-714139-C. The jury trial began on March 18, 2021 with jury selection, and will last for approximately another three weeks. Mr. Echols will be appearing in court every day until the case concludes. Furthermore, Mr. Echols will need to be prepared in the event that post-trial motions are necessary. Therefore, counsel for Respondents will be unable to devote sufficient time to drafting the answering brief until after the conclusion of the *Giacalone* trial.

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For the foregoing reasons, Respondents respectfully request a 45-day extension of time until Thursday, May 6, 2021, within which to file and serve their answering brief.

Dated this 22nd day of March 2021.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols  
Micah S. Echols, Esq.  
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*Attorneys for Respondents,*  
*Robyn Friedman and Donna Simmons*

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' ANSWERING BRIEF (First Request)** with the Nevada Supreme Court on the 22nd day March 2021.

Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

**Appellant–Kathleen June Jones**

Maria L. Parra-Sandoval (Legal Aid Center of Southern Nevada, Inc.)  
Joel E. Tasca (Ballard Spahr LLP/Las Vegas)

**Respondent–Donna Simmons**

Patrick C. McDonnell (Michaelson & Associates, Ltd.)  
John P. Michaelson (Michaelson & Associates, Ltd.)  
Jeffrey R. Sylvester (Sylvester & Polednak, Ltd.)

**Respondent–Robyn Friedman**

Patrick C. McDonnell (Michaelson & Associates, Ltd.)  
John P. Michaelson (Michaelson & Associates, Ltd.)  
Jeffrey R. Sylvester (Sylvester & Polednak, Ltd.)

/s/ Anna Gresl

Anna Gresl, an employee of  
Claggett & Sykes Law Firm