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Electronically Filed  
May 05 2021 06:08 p.m.  
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*Attorneys for Respondents, Robyn Friedman and Donna Simmons*

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

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

Case No.: 81799

KATHLEEN JUNE JONES,

Appellant,

vs.

ROBYN FRIEDMAN; AND DONNA  
SIMMONS,

Respondents.

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

Respondents, Robyn Friedman, and Donna Simmons (“Respondents”), by and through their counsel of record, respectfully move this Honorable Court, pursuant to NRAP 31(b), for an extension of two weeks in which to file Respondents’ answering brief.

Respondents’ answering brief was originally due on March 22, 2021. This Court previously granted one extension of time to May 6, 2021. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of two weeks, Respondents’ answering brief will be due on Thursday, May 20, 2021.

Good cause exists to grant the requested extension of two weeks for the following reasons:

1. The Court previously granted Respondents’ first motion for extension of time based upon Mr. Echols, who is lead appellate counsel for Respondents, being tied up in a jury trial in the Eighth Judicial District Court that lasted over three weeks. *See Giacalone v. MedicWest Ambulance, Inc. et al.*, Case No. A-15-714139-C. Respondents requested, and this Court granted, an extension of 45 days.

2. Mr. Echols and his wife have a minor daughter who was born with a congenital heart defect. Her doctors have performed several heart surgeries to date and have also recommended future heart surgeries. During the height of the COVID pandemic, no heart surgeries were scheduled due to the risk of infection. And, office

visits were also very limited and had been postponed. In a recent office visit, these heart doctors recommended an additional heart procedure for Mr. Echols' daughter which will take place on May 5, 2021. Because some time has passed since Mr. Echols' daughter's previous heart surgery, these heart doctors have warned that this heart procedure will turn into another heart surgery very soon. The planning for this heart procedure and the likely heart surgery have required Mr. Echols to miss time in the office and care for the rest of his family.

3. Despite these unforeseen events, Mr. Echols has reviewed the record with his staff and created the Respondents' Appendix, which is now filed with the Court, including the proposed sealed volumes that are awaiting the Court's approval. Unfortunately, Appellant's counsel did not confer with Respondents' counsel regarding the preparation of a potential joint appendix, thus requiring an additional 15 appendix volumes to accurately demonstrate the work performed by Respondents in the District Court that is now challenged in this appeal.

4. The additional requested time of two weeks will allow Mr. Echols to complete the answering brief and confer with his clients and co-counsel on the positions taken in the final draft of the answering brief before filing.

For the foregoing reasons, Respondents respectfully request a two-week extension of time until May 20, 2021, within which to file and serve their answering

brief. This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b).

Dated this 5th day of May 2021.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' ANSWERING BRIEF (Second Request)** with the Nevada Supreme Court on the 5th day May 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)

/s/ Anna Gresl

Anna Gresl, an employee of  
Claggett & Sykes Law Firm