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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
(Third Request)

MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENTS' ANSWERING BRIEF
(Third 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 one week in which to file Respondents’ Answering Brief.

Respondents’ Answering Brief was originally due on March 22, 2021. This Court previously granted a second extension of time to May 20, 2021. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of one week, Respondents’ Answering Brief will be due on May 27, 2021.

Good cause exists to grant the requested extension of one week for the following reasons:

1. The Court previously granted Respondents’ request for a second extension of time of two weeks based upon a heart procedure that Mr. Echols’ youngest daughter had on May 5, 2021, which included time out of the office. Mr. Echols appreciates the Court granting this extension.

2. Mr. Echols was in a car crash in November 2019. Unfortunately, he has suffered a spine injury from this crash. In the last year and a half, he has gone

through a variety of different treatments with several medical providers. Of these medical providers, Mr. Echols regularly sees a pain management doctor. He has also consulted with a spine surgeon and has a surgical recommendation, due to the severity of his spine injury. In the last couple of weeks, Mr. Echols has experienced increased pain in his back, beyond the normal pain that is being managed. This pain has risen to the level such that Mr. Echols cannot sit in a chair for long periods of time. And, Mr. Echols made an appointment with his spine surgeon to schedule the recommended spine surgery in the upcoming months. This increased pain has made it difficult for Mr. Echols to complete the Respondents' Answering Brief.

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For the foregoing reasons, Respondents respectfully request a one-week extension of time until May 27, 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 20th day of May 2021.

CLAGGETT & SYKES LAW FIRM

By /s/ Micah S. Echols

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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 (Third Request)** with the Nevada Supreme Court on the 20th 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