Electronically Filed IN THE SUPREME COURT OF THE STATE OF NOT 12:46 p.m. Elizabeth A. Brown Clerk of Supreme Court

WASHOE COUNTY HUMAN SERVICES AGENCY, Petitioner,

v.

THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF WASHOE; AND THE HONORABLE PAIGE DOLLINGER, DISTRICT JUDGE, Respondents, and, HOPE R.; CHRISTOPHER R.; AND Z. R., A MINOR CHILD, Real Parties in Interest.

Docket No. 83524

REAL PARTY IN INTEREST CHRISTOPHER R.'S JOINDER TO ANSWERING BRIEF

DAMIAN D.Q. SINNOTT, ESQ. and BENJAMIN PEARCE, ESQ. Deputy Alternative Public Defenders Washoe County Alternate Public Defender's Office State Bar Nos. 12095, 15304 dsinnott@washoecounty.gov; bpearce@washoecounty.gov Attorneys for Real Party in Interest Christopher R.

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ROUTING STATEMENT

Real Party in Interest Christopher R. agrees with WCHSA and the other Real

Parties in Interest that the Nevada Supreme Court should keep and decide this writ

petition under NRAP 17(a)(10) (specifically assigning cases "involving the

termination of parental rights" to the Supreme Court). NRAP 17(a).

I. JOINDER TO ANSWERING BRIEF OF REAL PARTY IN

INTEREST HOPE R.

Real Party in Interest Christopher R., pursuant to NRAP 28(i), joins and

incorporates the answering brief filed by Real Party in Interest Hope R. In addition

to the argument laid out by Real Party in Interest Hope R., Christopher R. would

also point to the authority granted to the family courts pursuant to NRS 3.223. In

relevant part, that statute grants the family court original, exclusive jurisdiction in

any proceeding brought pursuant to title 5 of NRS or chapter 128 or 432B of NRS.

NRS 3.223(1)(a).

Date: November 12, 2021

By: Damian D.Q. Sinnott, Esq

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2

II. ATTORNEY'S CERTIFICATE

- 1. I hereby certify that this joinder to answering brief complies with the formatting requirements of NRAP 32(a)(4)-(6), and either the page- or type-volume limitations stated in NRAP 32(a)(7) because this brief has been prepared in a proportionally spaced typeface using Microsoft Word 2013 in 14 point Times New Roman.
- 2. I further certify that this brief complies with the page- or type-volume limitations of NRAP 32(a)(7) because, excluding the parts of the brief exempted by NRAP 32(a)(7)(C) it is proportionately spaced, has a typeface of 14 points or more, and contains less than 14,000 words (86 words) and/or does not exceed 1,300 lines of text.
- 3. Finally, I hereby certify that I have read this appellate brief, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in the brief regarding matters in the record to be supported by a reference to the page and volume number, if any, of the transcript or appendix where the matter relied on is to be found. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

By: Damian D.Q. Sinnott, Esq DAMIAN D.Q. SINNOTT, ESQ. Deputy Alternate Public Defender Washoe County Alternate Public Defender 350 South Center Street Reno, NV 89501 (775) 567-2448 ATTORNEY OF RECORD FOR CHRISTOPHER R.

III. CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on November 12, 2021 Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

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Deputy District Attorney
Washoe County District Attorney's Office

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