

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

2  
3   IN THE MATTER OF THE GUARDIANSHIP  
4   OF THE PERSON AND ESTATE OF  
5   KATHLEEN JUNE JONES, AN ADULT  
6   PROTECTED PERSON,

No. 83967

Electronically Filed  
Jun 23 2022 10:35 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

7  
8   KATHLEEN JUNE JONES,

9           Appellant,

10   *vs.*

11   ROBYN FRIEDMAN; AND DONNA  
12   SIMMONS,

13           Respondents.

14                                   **APPEAL**

15  
16           From the Eighth Judicial District Court, Clark County  
17           The Honorable Linda Marquis, District Judge  
18           District Court Case No. G-19-052263-A

19                                   **APPELLANT'S APPENDIX**

20                                   Scott Cardenas  
21                                   Nevada Bar No. 14851  
22                                   Elizabeth Mikesell  
23                                   Nevada Bar No. 08034  
24           Legal Aid Center of Southern Nevada  
25           725 East Charleston Boulevard  
26           Las Vegas, Nevada 89104  
27           (702) 386-1539  
28           *Attorneys for Appellant*

**ALPHABETICAL INDEX TO APPELLANT'S APPENDIX**

DESCRIPTION	VOL.	BATES NUMBERS
Accounting	I	AA00055–00063
Affidavit in Support of Ex Parte Petition for an Order for the Attendance of the Protected Person at the February 11, 2021 Hearing	I	AA00216–00220
Affidavit of John P. Michaelson, Esq., in Support of Ex Parte Petition to Shorten Time to Hear Verified Petition for Communication, Visits, and Vacation Time with Protected Person	I	AA00241–00242
Amended First Accounting	II	AA00455–00466
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Case Appeal Statement	V	AA01132–01138
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Certificate of Service for (1) Clerk's Notice of Hearing on Petition for Visitation with Protected Person; (2) Petition for Visitation with the Protected Person; and (3) Supplement to Petition for Visitation with the Protected Person	II	AA00333–00334
Clerk's Notice of Nonconforming Document	I	AA00098–00100
Confidential Physician's Certificate of Incapacity and Medical Records	I	AA00001–00006 <b>Submitted to the Court Confidentially</b>
Confidential Report of AOC Investigator	III	AA00542–00549 <b>Submitted to the Court Confidentially</b>
Exhibits to Motion to Stay Evidentiary Hearing Pending Petition for Writ of	II	AA00417–00451



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5	Kimberly Jones's Memorandum of Status	II	AA00263-00293	
6	Kimberly Jones's Memorandum of Status dated August 06, 2021	III, IV	AA00711-00768	
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	Protected Person		

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APPELLANT'S APPENDIX: VOLUME I

Submitted Confidentially to the Court:

Confidential Physician's Certificate of Incapacity and Medical Records (Bates Numbers AA  
000001- AA 000006)



Electronically Filed  
9/23/2019 3:36 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

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Ph: (702) 731-2333  
Fax: (702) 731-2337  
Attorneys for Petitioners

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )

Kathleen June Jones, )

An Adult Protected Person. )

Case Number: G-19-052263-A  
Department: B

*Hearing: 10/3/19 @ 9:00am*

**ORDER GRANTING EX PARTE PETITION FOR APPOINTMENT OF TEMPORARY  
GUARDIAN OF THE PERSON AND ESTATE AND ISSUANCE OF LETTERS OF  
TEMPORARY GUARDIANSHIP**

☒ TEMPORARY GUARDIANSHIP  
☐ Person  
☐ Estate ☐ Summary Admin.  
☒ Person and Estate

☐ GENERAL GUARDIANSHIP  
☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☐ SPECIAL GUARDIANSHIP  
☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☐ NOTICES / SAFEGUARDS  
☐ Blocked Account  
☐ Bond Posted

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**RECEIVED**  
**SEP 20 2019**  
**DISTRICT COURT**  
**DEPT B**

1 The Court having reviewed Robyn Friedman's and Donna Simmons' Ex Parte Petition  
2 for Appointment of Temporary Guardian of the Person and Estate of Kathleen June Jones, the  
3 Court having considered the Petition and examined the evidence, being fully informed of the  
4 situation, the Court now finds: (i) there is reasonable cause to believe Ms. Jones is unable to  
5 respond to the substantial and immediate risk of physical harm or need for immediate medical  
6 attention and such belief is rendered from a physician who is licensed to practice in Nevada and  
7 has executed a certificate as such and such certificate is on file with this Court; (ii) good-faith  
8 attempts have been made to notify those persons entitled to notice, pursuant to NRS 159.047, or  
9 that notice under the circumstances is not possible; and (iii) a temporary guardianship of the  
10 person and estate of Kathleen June Jones should be established.

11 ORDER

12 The facts of the Petition having been found to be true, and good cause appearing  
13 therefore, the Court now grants the Petition as follows:

14 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Robyn Friedman and  
15 Donna Simmons be appointed as the temporary guardians of the person and estate of Kathleen  
16 June Jones;

17 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk of the Court  
18 hereby be directed to issue Letters of Temporary Guardianship to Robyn Friedman and Donna  
19 Simmons upon subscribing to the appropriate oath of office, and bond be waived, since there are  
20 no liquid assets;

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that if any liquid assets or  
22 income that total under \$10,000 are discovered, Robyn Friedman and Donna Simmons are  
23 authorized to establish an unblocked guardianship account at a financial institution located in  
24  
25

1 Nevada, and that Petitioners are authorized to utilize such property to pay for Ms. Jones' care,  
2 maintenance and support;

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that if the value of Ms.  
4 Jones' cumulative assets and income exceed \$10,000, those assets are to be placed in a blocked  
5 guardianship account to be established by Petitioners as either temporary guardian or general  
6 guardians at a financial institution located in Nevada and selected by Petitioners;

7 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court grant  
8 summary administration dispensing with the requirement of an accounting, if it is found that the  
9 value of the estate in the State of Nevada is less than \$10,000. If assets are discovered in the  
10 State of Nevada valued in excess of this amount, the guardians are required to file an accounting;

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners create and  
12 implement a specific care plan for Ms. Jones, including her living arrangements and facilitating  
13 visitation for each member of Ms. Jones' family, including her husband;  
14

15 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that to carry out the  
16 function of temporary guardians of the person and estate of Kathleen June Jones, Robyn  
17 Friedman and Donna Simmons are vested with the powers as stated herein and, including to  
18 assist with Ms. Jones' medical decisions related to her care, to ensure Ms. Jones' finances are  
19 protected and that Ms. Jones' financial needs are addressed, and to access financial information  
20 in order to apply for government benefits, including Medicaid;

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners are  
22 authorized access to any and all historical account information and for any and all of Ms. Jones'  
23 assets for investigative purposes and to apply for government benefits, and sign all documents  
24 required by the Division of Welfare and Supportive Services, or any third party, to obtain  
25

1 Medicaid benefits or other appropriate benefits for Ms. Jones, including executing and  
2 establishing a qualified income trust, if necessary;

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners are  
4 authorized to obtain confidential financial information of Ms. Jones including, but not limited to  
5 statements, cancelled checks, withdrawal authorizations and any other information from financial  
6 institutions, brokerage or mutual fund firms, the United States Social Security Administration,  
7 and other persons and agencies which have engaged in transactions concerning the financial  
8 affairs of Ms. Jones, whether said accounts or records reflect the name of Ms. Jones individually,  
9 or with one or more other persons or trust, to apply for government benefits, including Medicaid;

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners request  
11 and receive information from any other person or agency, which is currently or have previously  
12 been obligated to pay money or other benefits to Ms. Jones;

13 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners are  
14 authorized as Ms. Jones' personal representative for purposes of the Health Insurance Portability  
15 and Accountability Act of 1996, Public Law 104-191, and any applicable regulations. That  
16 Petitioners are authorized to obtain and be permitted to receive any and all medical records and  
17 information concerning the past and present condition and historical treatment of Ms. Jones  
18 including but not limited to, examination reports, medical charts, medical notes, which are or  
19 may be lodged with any persons, family members, friends, along with any and all medical  
20 providers, physicians, hospitals, care facilities, institutions, and/or third parties;

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Court suspend  
22 any general durable power of attorney and/or healthcare power of attorney documents previously  
23 executed by Ms. Jones if any, for the duration of the temporary guardianship;  
24  
25

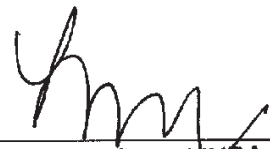
1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that upon taking  
2 appropriate actions and efforts outlined above, or the protected person dies, the guardianship be  
3 terminated, and the guardian be discharged from all liability for her/his or its term of service as  
4 temporary guardian.

5 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED, that the Court approve  
6 payment of attorneys' fees and costs from the guardianship estate to the law firm of Michaelson  
7 & Associates, Ltd. at the conclusion of the guardianship proceeding, subject to Court  
8 confirmation;

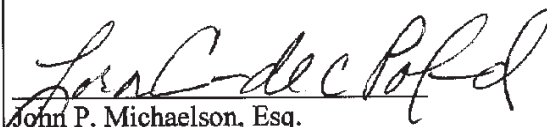
9 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Court approve  
10 payment of guardians' fees to be paid for services as rendered, pursuant to NRS 159.105 from  
11 the assets of the Estate and subject to Court confirmation; and

12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that a hearing be held  
13 within 10 days and on October 3, 2019, at 9:00 A.m. in order to determine the  
14 need to extend the temporary guardianship.

15 DATED: September 23, 2019.

16  
17   
18 District Court Judge **LINDA MARQUIS**

18 Submitted by:  
19 MICHAELSON & ASSOCIATES, LTD.

20   
21 John P. Michaelson, Esq.  
22 Nevada Bar No. 7822  
23 Lora L. Caindec-Poland, Esq.  
24 Nevada Bar No. 14178  
25 2200 Paseo Verde Parkway, Ste. 160  
Henderson, Nevada 89052  
Attorneys for Petitioner

*Steven D. Grierson*

1 **NEO**

2 John P. Michaelson, Esq.

3 Nevada Bar No. 7822

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5 Lora L. Caindec-Poland, Esq.

6 Nevada Bar No. 14178

7 Email: [lora@michaelsonlaw.com](mailto:lora@michaelsonlaw.com)

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9 2200 Paseo Verde Parkway, Ste. 160

10 Henderson, Nevada 89052

11 Ph: (702) 731-2333

12 Fax: (702) 731-2337

13 Attorneys for Petitioners

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 IN THE MATTER OF THE GUARDIANSHIP )  
17 OF THE PERSON AND ESTATE OF: )

18 Kathleen June Jones, )

19 An Adult Protected Person. )

Case Number: G-19-052263-A

Department: B

20 **NOTICE OF ENTRY OF ORDER GRANTING EX PARTE PETITION FOR**  
21 **APPOINTMENT OF TEMPORARY GUARDIANS OF THE PERSON AND ESTATE**  
22 **AND ISSUANCE OF LETTERS OF TEMPORARY GUARDIANSHIP**

23 To: Whom It May Concern:

24 Notice is hereby given that on September 23, 2019, an Order Granting Ex Parte Petition  
25 for Appointment of Temporary Guardians of the Person and Estate and Issuance of Letters of  
Temporary Guardianship was entered in the above-titled matter, a copy of said Order is attached  
hereto.

DATED: September 23, 2019.

MICHAELSON & ASSOCIATES, LTD.

*Lora L. Caindec-Poland*  
John P. Michaelson, Esq.

Nevada Bar No. 7822

2200 Paseo Verde Parkway, Ste. 160

Henderson, Nevada 89052

#14178



**CERTIFICATE OF SERVICE**

Pursuant to Nevada Rule of Civil Procedure 5(b), the undersigned hereby certifies that on September 24, 2019 a copy of the Notice of Entry of Order Granting Ex Parte Petition for Appointment of Temporary Guardians of the Person and Estate and Issuance of Letters of Temporary Guardianship and said Order was mailed by regular US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada to the following individuals and/or entities at the following addresses:

Kathleen June Jones 6277 Kraft Avenue Las Vegas, Nevada 89130	Rodney Gerald Yeoman 2540 E. Harmon Avenue Las Vegas, Nevada 89102
David C. Johnson, Esq. JOHNSON & JOHNSON 1160 N. Town Center Drive, Suite 390 Las Vegas, Nevada 89144 Attorney for	Ty E. Kehoe, Esq. KEHOE & ASSOCIATES 871 Coronado Center Drive, Suite 200 Henderson, Nevada 89052 Attorney for Rodney Gerald Yeoman and Richard Powell
Teri Butler 586 N. Magdalena Street Dewey, AZ 86327	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Jon Criss 804 Harksness Lane, Unit 3 Redondo Beach, CA 90278
Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832	Tiffany O'Neal 177 N. Singingwood Street, Unit 13 Orange, CA 92869

Courtney Simmons  
765 Kimbark Avenue  
San Bernardino, CA 92407

Ampersand Man  
2824 High Sail Court  
Las Vegas, Nevada 89117

Division of Welfare and Supportive Services  
Medicaid Chief Eligibility and Payments  
1470 College Parkway  
Carson City, Nevada 89706

MICHAELSON & ASSOCIATES, LTD.

  
Employee of Michaelson & Associates



Electronically Filed  
9/23/2019 3:36 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

1 **TGPE**

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3 Nevada Bar No. 7822

4 Email: [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)

5 Lora L. Caindec-Poland, Esq.

6 Nevada Bar No. 14178

7 Email: [lora@michaelsonlaw.com](mailto:lora@michaelsonlaw.com)

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9 2200 Paseo Verde Parkway, Ste. 160

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11 Ph: (702) 731-2333

12 Fax: (702) 731-2337

13 Attorneys for Petitioners

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

14 IN THE MATTER OF THE GUARDIANSHIP )  
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**ORDER GRANTING EX PARTE PETITION FOR APPOINTMENT OF TEMPORARY  
GUARDIAN OF THE PERSON AND ESTATE AND ISSUANCE OF LETTERS OF  
TEMPORARY GUARDIANSHIP**

18 ☒ TEMPORARY GUARDIANSHIP

19 ☐ Person

20 ☐ Estate

☐ Summary Admin.

21 ☒ Person and Estate

☐ GENERAL GUARDIANSHIP

☐ Person

☐ Estate

☐ Summary Admin.

☐ Person and Estate

☐ SPECIAL GUARDIANSHIP

☐ Person

☐ Estate

☐ Summary Admin.

☐ Person and Estate

☐ NOTICES / SAFEGUARDS

☐ Blocked Account

☐ Bond Posted

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**RECEIVED**

**SEP 20 2019**

**DISTRICT COURT  
DEPT B**

1 The Court having reviewed Robyn Friedman's and Donna Simmons' Ex Parte Petition  
2 for Appointment of Temporary Guardian of the Person and Estate of Kathleen June Jones, the  
3 Court having considered the Petition and examined the evidence, being fully informed of the  
4 situation, the Court now finds: (i) there is reasonable cause to believe Ms. Jones is unable to  
5 respond to the substantial and immediate risk of physical harm or need for immediate medical  
6 attention and such belief is rendered from a physician who is licensed to practice in Nevada and  
7 has executed a certificate as such and such certificate is on file with this Court; (ii) good-faith  
8 attempts have been made to notify those persons entitled to notice, pursuant to NRS 159.047, or  
9 that notice under the circumstances is not possible; and (iii) a temporary guardianship of the  
10 person and estate of Kathleen June Jones should be established.

11 ORDER

12 The facts of the Petition having been found to be true, and good cause appearing  
13 therefore, the Court now grants the Petition as follows:

14 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Robyn Friedman and  
15 Donna Simmons be appointed as the temporary guardians of the person and estate of Kathleen  
16 June Jones;

17 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk of the Court  
18 hereby be directed to issue Letters of Temporary Guardianship to Robyn Friedman and Donna  
19 Simmons upon subscribing to the appropriate oath of office, and bond be waived, since there are  
20 no liquid assets;

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that if any liquid assets or  
22 income that total under \$10,000 are discovered, Robyn Friedman and Donna Simmons are  
23 authorized to establish an unblocked guardianship account at a financial institution located in  
24  
25



1 Nevada, and that Petitioners are authorized to utilize such property to pay for Ms. Jones' care,  
2 maintenance and support;

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that if the value of Ms.  
4 Jones' cumulative assets and income exceed \$10,000, those assets are to be placed in a blocked  
5 guardianship account to be established by Petitioners as either temporary guardian or general  
6 guardians at a financial institution located in Nevada and selected by Petitioners;

7 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court grant  
8 summary administration dispensing with the requirement of an accounting, if it is found that the  
9 value of the estate in the State of Nevada is less than \$10,000. If assets are discovered in the  
10 State of Nevada valued in excess of this amount, the guardians are required to file an accounting;

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners create and  
12 implement a specific care plan for Ms. Jones, including her living arrangements and facilitating  
13 visitation for each member of Ms. Jones' family, including her husband;  
14

15 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that to carry out the  
16 function of temporary guardians of the person and estate of Kathleen June Jones, Robyn  
17 Friedman and Donna Simmons are vested with the powers as stated herein and, including to  
18 assist with Ms. Jones' medical decisions related to her care, to ensure Ms. Jones' finances are  
19 protected and that Ms. Jones' financial needs are addressed, and to access financial information  
20 in order to apply for government benefits, including Medicaid;

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners are  
22 authorized access to any and all historical account information and for any and all of Ms. Jones'  
23 assets for investigative purposes and to apply for government benefits, and sign all documents  
24 required by the Division of Welfare and Supportive Services, or any third party, to obtain  
25

1 Medicaid benefits or other appropriate benefits for Ms. Jones, including executing and  
2 establishing a qualified income trust, if necessary;

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners are  
4 authorized to obtain confidential financial information of Ms. Jones including, but not limited to  
5 statements, cancelled checks, withdrawal authorizations and any other information from financial  
6 institutions, brokerage or mutual fund firms, the United States Social Security Administration,  
7 and other persons and agencies which have engaged in transactions concerning the financial  
8 affairs of Ms. Jones, whether said accounts or records reflect the name of Ms. Jones individually,  
9 or with one or more other persons or trust, to apply for government benefits, including Medicaid;

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners request  
11 and receive information from any other person or agency, which is currently or have previously  
12 been obligated to pay money or other benefits to Ms. Jones;

13 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Petitioners are  
14 authorized as Ms. Jones' personal representative for purposes of the Health Insurance Portability  
15 and Accountability Act of 1996, Public Law 104-191, and any applicable regulations. That  
16 Petitioners are authorized to obtain and be permitted to receive any and all medical records and  
17 information concerning the past and present condition and historical treatment of Ms. Jones  
18 including but not limited to, examination reports, medical charts, medical notes, which are or  
19 may be lodged with any persons, family members, friends, along with any and all medical  
20 providers, physicians, hospitals, care facilities, institutions, and/or third parties;

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Court suspend  
22 any general durable power of attorney and/or healthcare power of attorney documents previously  
23 executed by Ms. Jones if any, for the duration of the temporary guardianship;  
24  
25



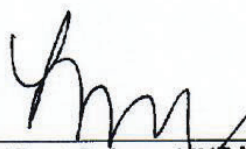
1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that upon taking  
2 appropriate actions and efforts outlined above, or the protected person dies, the guardianship be  
3 terminated, and the guardian be discharged from all liability for her/his or its term of service as  
4 temporary guardian.

5 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED, that the Court approve  
6 payment of attorneys' fees and costs from the guardianship estate to the law firm of Michaelson  
7 & Associates, Ltd. at the conclusion of the guardianship proceeding, subject to Court  
8 confirmation;

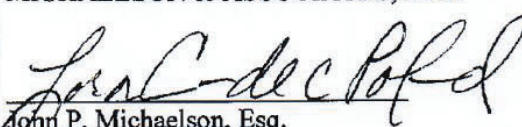
9 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Court approve  
10 payment of guardians' fees to be paid for services as rendered, pursuant to NRS 159.105 from  
11 the assets of the Estate and subject to Court confirmation; and

12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that a hearing be held  
13 within 10 days and on October 3, 2019, at 9:00 A.m. in order to determine the  
14 need to extend the temporary guardianship.

15 DATED: September 23, 2019.

16  
17   
District Court Judge **LINDA MARQUIS**

18 Submitted by:  
19 MICHAELSON & ASSOCIATES, LTD.

20   
21 John P. Michaelson, Esq.  
22 Nevada Bar No. 7822  
23 Lora L. Caindec-Poland, Esq.  
24 Nevada Bar No. 14178  
25 2200 Paseo Verde Parkway, Ste. 160  
Henderson, Nevada 89052  
Attorneys for Petitioner



1 **LETG**

2 John P. Michaelson, Esq.

3 Nevada Bar No. 7822

4 Email: [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)

5 Lora L. Caindec-Poland, Esq.

6 Nevada Bar No. 14178

7 Email: [lora@michaelsonlaw.com](mailto:lora@michaelsonlaw.com)

8 MICHAELSON & ASSOCIATES, LTD.

9 2200 Paseo Verde Parkway, Ste. 160

10 Henderson, Nevada 89052

11 Ph: (702) 731-2333

12 Fax: (702) 731-2337

13 Attorneys for Petitioners

14 **DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 IN THE MATTER OF THE GUARDIANSHIP )  
17 OF THE PERSON AND ESTATE OF: )

18 Kathleen June Jones, )

19 An Adult Protected Person. )

Case Number: G-19-052263-A

Department: B

20 **LETTERS OF TEMPORARY GUARDIANSHIP**

21 ☒ TEMPORARY GUARDIANSHIP

22 ☐ Person

23 ☐ Estate ☐ Summary Admin.

24 ☒ Person and Estate

☐ GENERAL GUARDIANSHIP

☐ Person

☐ Estate

☐ Summary Admin.

☐ Person and Estate

25 ☐ SPECIAL GUARDIANSHIP

☐ Person

☐ Estate ☐ Summary Admin.

☐ Person and Estate

☐ NOTICES / SAFEGUARDS

☐ Blocked Account

☐ Bond Posted

☐ Public Guardian Bond

On September 23, 2019, an Order of the Court was entered appointing Robyn Friedman and Donna Simmons as Temporary Guardians of the Person and Estate of Kathleen June Jones. The named Temporary Guardians, having duly qualified, is authorized to act and has the authority to perform the duties of such Temporary Guardians, with powers limited to those necessary to

1 assist in the emergency as stated in the Order, for a period of 10 days, or unless an Order  
2 Extending Temporary Guardianship, has been duly entered by the Court. The order includes:

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the  
4 Clerk of the Court hereby be directed to issue Letters of Temporary Guardianship  
5 to Robyn Friedman and Donna Simmons upon subscribing to the appropriate oath  
6 of office, and bond be waived, since there are no liquid assets;

7 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that if any  
8 liquid assets or income that total under \$10,000 are discovered, Robyn Friedman  
9 and Donna Simmons are authorized to establish an unblocked guardianship  
10 account at a financial institution located in Nevada, and that Robyn Friedman and  
11 Donna Simmons are authorized to utilize such property to pay for Ms. Jones'  
12 care, maintenance and support;

13 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that if the  
14 value of Ms. Jones' cumulative assets and income exceed \$10,000, those assets  
15 are to be placed in a blocked guardianship account to be established by Robyn  
16 Friedman and Donna Simmons as either temporary guardian or general guardians  
17 at a financial institution located in Nevada and selected by Robyn Friedman and  
18 Donna Simmons.

19 In testimony of which, I have this date signed these letters and affixed the seal of the Court.

20 STEVEN D. GRIERSON  
21 CLERK OF COURT

22 By:

23   
24 Deputy Clerk  
25 Joshua Puppe

Electronically Issued

9/23/2019

Date



OATH

STATE OF CALIFORNIA )  
): ss.  
COUNTY OF ORANGE COUNTY )

Donna Simmons of 1441 N. Redgum, Unit G, Anaheim, CA 92806, solemnly affirms that she will faithfully perform according to law, the duties of Temporary Guardian of the Person and Estate of Kathleen June Jones and that any matters stated in any petition or paper filed with the Court are true of her own knowledge or if any matters are stated on information or belief, she believes them to be true.

EXECUTED: this <sup>September</sup> ~~10th~~ day of ~~June~~ <sup>MSM</sup>, 2019.

By: Donna Simmons  
Donna Simmons

SUBSCRIBED and AFFIRMED to before me on  
this <sup>18th</sup> day of September, 2019, by Donna Simmons.

Marjorie J  
NOTARY PUBLIC



## JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Orange

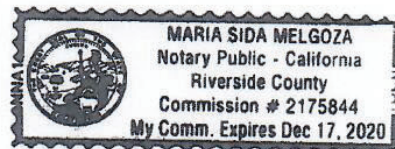
Subscribed and sworn to (or affirmed) before me on  
this 18<sup>th</sup> day of September, 20 19  
by Donna Simmons

proved to me on the basis of satisfactory evidence to be the person(s) who  
appeared before me.

Signature

Maria Sida J

(Seal)



OATH

STATE OF NEVADA )  
COUNTY OF CLARK ) ss.

Robyn Friedman of 2824 High Sail Court, Las Vegas, Nevada 89117 solemnly affirms that she will faithfully perform according to law, the duties of Temporary Guardian of the Person and Estate of Kathleen June Jones and that any matters stated in any petition or paper filed with the Court are true of her own knowledge or if any matters are stated on information or belief, she believes them to be true.

EXECUTED: this 18 day of September, 2019.

By: R. Friedman  
Robyn Friedman

SUBSCRIBED and AFFIRMED to before me on  
this 18 day of June, 2019, by Robyn Friedman.

Hardeep  
NOTARY PUBLIC



OAC

Maria L. Parra-Sandoval, Esq.

Nevada Bar No. 13736

[mparra@lacsns.org](mailto:mparra@lacsns.org)

**LEGAL AID CENTER OF  
SOUTHERN NEVADA, INC.**

725 E. Charleston Blvd

Las Vegas, NV 89104

Telephone: (702) 386-1526

Facsimile: (702) 386-1526

*Attorney for Kathleen J. Jones, Adult Protected Person*

**EIGHTH JUDICIAL DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA**

In the Matter of the Guardianship of the Person  
and Estate of:

**Case No.: G-19-052263-A  
Dept. No.: B**

KATHLEEN J. JONES,

Adult Protected Person.

**ORDER APPOINTING COUNSEL AND DIRECTING  
RELEASE OF MEDICAL AND FINANCIAL RECORDS AND INFORMATION**

Pursuant to NRS 159.0485(1)-(2), LEGAL AID CENTER OF SOUTHERN NEVADA, INC., is hereby appointed as counsel for KATHLEEN J. JONES, the protected person herein.

IT IS HEREBY ORDERED THAT LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and each of its attorneys and employees, shall have access to and be permitted to speak confidentially with KATHLEEN J. JONES at any public or private institution, facility, or residence.

IT IS FURTHER ORDERED THAT LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and each of its attorneys and employees, shall be permitted to discuss the care, treatment, and finances pertaining to KATHLEEN J. JONES with any individual possessing knowledge of the same, including protected health information under the provisions of the Federal Health Insurance Portability and Accountability Act of 1996 ("HIPPA").

**RECEIVED**

**SEP 25 2019**

**DISTRICT COURT  
DEPT B**

AA 000025

1 IT IS FURTHER ORDERED THAT LEGAL AID CENTER OF SOUTHERN  
2 NEVADA, INC., shall be permitted to obtain copies of any and all documents and records  
3 relating to KATHLEEN J. JONES, without charge, from any guardian; any person or entity  
4 having a financial relationship with KATHLEEN J. JONES, including but not limited to any  
5 financial institution, mortgage servicer, or landlord; any human services agency, including but  
6 not limited to Aging and Disability Services Division, Elder Protective Services; any medical  
7 professional, including but not limited to physicians, psychologists, psychiatrists, mental health  
8 clinics, or other health care providers; and any agency, facility, individual, or entity providing  
9 placement, care, treatment, or services of any kind to KATHLEEN J. JONES, including  
10 documents and records containing confidential information or health information protected  
11 under HIPPA.

12 IT IS FURTHER ORDERED THAT prior to any change in the placement, residence, or  
13 address of KATHLEEN J. JONES, KATHLEEN J. JONES's guardian shall notice LEGAL AID  
14 CENTER OF SOUTHERN NEVADA, INC., at least ten business days prior to the anticipated  
15 change in placement or residence. In the event of an emergency change in placement or  
16 residence, the guardian shall notice LEGAL AID CENTER OF SOUTHERN NEVADA, INC.  
17 as soon as possible.

18 IT IS FURTHER ORDERED THAT LEGAL AID CENTER OF SOUTHERN  
19 NEVADA, INC., and each of its attorneys and employees, shall have access to any and all data,  
20 information, reports, documents, and records held by local, state, and federal governmental or  
21 law enforcement agencies, for the purpose of inspecting and/or copying such data, information,  
22 reports, documents, and records relating to KATHLEEN J. JONES, whether public, private, or  
23 confidential, in order to provide legal representation to KATHLEEN J. JONES relating to the  
24 guardianship and the protection of KATHLEEN J. JONES's rights as provided by law. This  
25 includes access to data, information, reports, documents, and records that would otherwise be  
26 confidential under NRS 200.5095 and includes the disclosure of information pursuant to NRS  
27 200.5098 and health information protected under HIPPA.  
28

1 IT IS FURTHER ORDERED that, in the event this case has previously been sealed by  
2 order of this Court or otherwise, the Clerk of the Court is hereby ordered and directed to provide  
3 LEGAL AID CENTER OF SOUTHERN NEVADA, and each of its attorneys and employees,  
4 full and complete access to the case and court file, both physical and electronic.

5 IT IS FURTHER ORDERED that the appointment of LEGAL AID CENTER OF  
6 SOUTHERN NEVADA, INC. as counsel for KATHLEEN J. JONES shall terminate when so  
7 ordered by this Court or upon this case being otherwise closed or dismissed or the guardianship  
8 terminated, at which time LEGAL AID CENTER OF SOUTHERN NEVADA, INC. shall be  
9 relieved of its duties as appointed counsel.

10 **IT IS SO ORDERED.**

11 DATED this 25 day of September, 2019.

12   
13 \_\_\_\_\_  
14 DISTRICT COURT JUDGE

15 *Submitted By:*

16 **LEGAL AID CENTER OF**  
17 **SOUTHERN NEVADA, INC.**

18 /s/ Maria L. Parra-Sandoval, Esq.

19 Maria L. Parra-Sandoval, Esq.

20 Nevada Bar No. 13736

21 [mparra@lacsncsn.org](mailto:mparra@lacsncsn.org)

22 725 E. Charleston Blvd

23 Las Vegas, NV 89104

24 Telephone: (702) 386-1526

25 Facsimile: (702) 386-1526

26 *Attorney for Kathleen J. Jones, Adult Protected Person*  
27  
28



1 **NEOJ**

2 Maria L. Parra-Sandoval, Esq.

3 Nevada Bar No. 13736

4 [mparra@lacsnsn.org](mailto:mparra@lacsnsn.org)

5 **LEGAL AID CENTER OF**

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7 725 E. Charleston Blvd

8 Las Vegas, NV 89104

9 Telephone: (702) 386-1526

10 Facsimile: (702) 386-1526

11 *Attorney for Kathleen J. Jones, Protected Person*

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**EIGHTH JUDICIAL DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA**

In the Matter of Guardianship of the Person  
and Estate of:

**Case No.: G-19-052263-A  
Dept. No.: B**

KATHLEEN J. JONES,

An Adult Protected Person.

**NOTICE OF ENTRY OF ORDER**

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that the attached  
**ORDER APPOINTING COUNSEL AND DIRECTING RELEASE OF MEDICAL AND  
FINANCIAL RECORDS AND INFORMATION** in the above captioned matter was entered  
on the 25<sup>th</sup> day of September, 2019.

DATED this 27<sup>th</sup> day of September, 2019.

**LEGAL AID CENTER OF  
SOUTHERN NEVADA, INC.**

/s/ Maria L. Parra-Sandoval, Esq.

Maria L. Parra-Sandoval, Esq.

Nevada Bar No. 13736

[mparra@lacsnsn.org](mailto:mparra@lacsnsn.org)

725 E. Charleston Blvd

Las Vegas, NV 89104

Telephone: (702) 386-1526

Facsimile: (702) 386-1526

*Attorney for Kathleen J. Jones, Protected Person*



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 27<sup>th</sup> day of September, 2019, I deposited in the United States Mail at Las Vegas, Nevada, a copy of the foregoing document entitled **NOTICE OF ENTRY OF ORDER** in a sealed envelope, mailed regular U.S. mail, upon which first class postage was fully prepaid, addressed to the following:

John P. Michaelson, Esq.  
MICHAELSON & ASSOCIATES  
2200 Paseo Verde Parkway, Ste. 160  
Henderson, NV 89052  
*Attorney for Petitioners*

Ty E. Kehoe, Esq.  
KEHOE & ASSOCIATES  
871 Coronado Center Drive, Suite 200  
Henderson, NV 89052  
*Attorney for Rodney G. Yeoman and Richard Powell*

David C. Johnson, Esq.  
JOHNSON & JOHNSON  
1160 N. Town Center Drive, Suite 390  
Las Vegas, NV 89144  
*Attorney for Kimberly Jones*

Division of Welfare and Supportive Services  
Medicaid Chief Eligibility and Payments  
1470 College Parkway  
Carson City, NV 89706

Ampersand Man  
C/O 2824 High Sail Ct.  
Las Vegas, NV 89117

Courtney Simmons  
765 Kimbark Ave  
San Bernardino, CA 92407

Tiffany O' Neal  
177 N. Singingwood St., Unit 13  
Orange, CA 92869

Ryan O'Neal  
112 Malven Ave., Apt E  
Fullerton, CA 92832

Jon Criss  
804 Harksness Ln., Unit 3  
Redondo Beach, CA 90278

Jen Adamo  
14 Edgewater Drive  
Magnolia, DE 19962

Scott Simmons  
1054 S. Verde St  
Anaheim, CA 92805

Teri Butler  
586 N. Magdalena St.  
Dewey, AZ 86327

///

AND I FURTHER CERTIFY that on the same date I electronically served the same document to the following via ODYSSEY, the Court's electronic filing system, pursuant to EDCR 8.05:

None.

/s/ Alexa Reanos  
Employee of Legal Aid Center of Southern Nevada





OAC

Maria L. Parra-Sandoval, Esq.

Nevada Bar No. 13736

[mparra@lacsns.org](mailto:mparra@lacsns.org)

**LEGAL AID CENTER OF  
SOUTHERN NEVADA, INC.**

725 E. Charleston Blvd

Las Vegas, NV 89104

Telephone: (702) 386-1526

Facsimile: (702) 386-1526

*Attorney for Kathleen J. Jones, Adult Protected Person*

**EIGHTH JUDICIAL DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA**

In the Matter of the Guardianship of the Person  
and Estate of:

**Case No.: G-19-052263-A  
Dept. No.: B**

KATHLEEN J. JONES,

Adult Protected Person.

**ORDER APPOINTING COUNSEL AND DIRECTING  
RELEASE OF MEDICAL AND FINANCIAL RECORDS AND INFORMATION**

Pursuant to NRS 159.0485(1)-(2), LEGAL AID CENTER OF SOUTHERN NEVADA, INC., is hereby appointed as counsel for KATHLEEN J. JONES, the protected person herein.

IT IS HEREBY ORDERED THAT LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and each of its attorneys and employees, shall have access to and be permitted to speak confidentially with KATHLEEN J. JONES at any public or private institution, facility, or residence.

IT IS FURTHER ORDERED THAT LEGAL AID CENTER OF SOUTHERN NEVADA, INC., and each of its attorneys and employees, shall be permitted to discuss the care, treatment, and finances pertaining to KATHLEEN J. JONES with any individual possessing knowledge of the same, including protected health information under the provisions of the Federal Health Insurance Portability and Accountability Act of 1996 ("HIPPA").

**RECEIVED**

**SEP 25 2019**

**DISTRICT COURT  
DEPT B**

AA 000031

1 IT IS FURTHER ORDERED THAT LEGAL AID CENTER OF SOUTHERN  
2 NEVADA, INC., shall be permitted to obtain copies of any and all documents and records  
3 relating to KATHLEEN J. JONES, without charge, from any guardian; any person or entity  
4 having a financial relationship with KATHLEEN J. JONES, including but not limited to any  
5 financial institution, mortgage servicer, or landlord; any human services agency, including but  
6 not limited to Aging and Disability Services Division, Elder Protective Services; any medical  
7 professional, including but not limited to physicians, psychologists, psychiatrists, mental health  
8 clinics, or other health care providers; and any agency, facility, individual, or entity providing  
9 placement, care, treatment, or services of any kind to KATHLEEN J. JONES, including  
10 documents and records containing confidential information or health information protected  
11 under HIPPA.

12 IT IS FURTHER ORDERED THAT prior to any change in the placement, residence, or  
13 address of KATHLEEN J. JONES, KATHLEEN J. JONES's guardian shall notice LEGAL AID  
14 CENTER OF SOUTHERN NEVADA, INC., at least ten business days prior to the anticipated  
15 change in placement or residence. In the event of an emergency change in placement or  
16 residence, the guardian shall notice LEGAL AID CENTER OF SOUTHERN NEVADA, INC.  
17 as soon as possible.

18 IT IS FURTHER ORDERED THAT LEGAL AID CENTER OF SOUTHERN  
19 NEVADA, INC., and each of its attorneys and employees, shall have access to any and all data,  
20 information, reports, documents, and records held by local, state, and federal governmental or  
21 law enforcement agencies, for the purpose of inspecting and/or copying such data, information,  
22 reports, documents, and records relating to KATHLEEN J. JONES, whether public, private, or  
23 confidential, in order to provide legal representation to KATHLEEN J. JONES relating to the  
24 guardianship and the protection of KATHLEEN J. JONES's rights as provided by law. This  
25 includes access to data, information, reports, documents, and records that would otherwise be  
26 confidential under NRS 200.5095 and includes the disclosure of information pursuant to NRS  
27 200.5098 and health information protected under HIPPA.  
28

1 IT IS FURTHER ORDERED that, in the event this case has previously been sealed by  
2 order of this Court or otherwise, the Clerk of the Court is hereby ordered and directed to provide  
3 LEGAL AID CENTER OF SOUTHERN NEVADA, and each of its attorneys and employees,  
4 full and complete access to the case and court file, both physical and electronic.

5 IT IS FURTHER ORDERED that the appointment of LEGAL AID CENTER OF  
6 SOUTHERN NEVADA, INC. as counsel for KATHLEEN J. JONES shall terminate when so  
7 ordered by this Court or upon this case being otherwise closed or dismissed or the guardianship  
8 terminated, at which time LEGAL AID CENTER OF SOUTHERN NEVADA, INC. shall be  
9 relieved of its duties as appointed counsel.

10 **IT IS SO ORDERED.**

11 DATED this 25 day of September, 2019.

12   
13 \_\_\_\_\_  
14 DISTRICT COURT JUDGE

15 *Submitted By:*

16 **LEGAL AID CENTER OF**  
17 **SOUTHERN NEVADA, INC.**

18 /s/ Maria L. Parra-Sandoval, Esq.

19 Maria L. Parra-Sandoval, Esq.

20 Nevada Bar No. 13736

21 [mparra@lacsnsn.org](mailto:mparra@lacsnsn.org)

22 725 E. Charleston Blvd

23 Las Vegas, NV 89104

24 Telephone: (702) 386-1526

25 Facsimile: (702) 386-1526

26 *Attorney for Kathleen J. Jones, Adult Protected Person*  
27  
28

*Steven D. Grierson*

1 **NEO**

2 John P. Michaelson, Esq.  
3 Nevada Bar No. 7822  
4 Email: [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)  
5 Lora L. Caindec-Poland, Esq.  
6 Nevada Bar No. 14178  
7 Email: [lora@michaelsonlaw.com](mailto:lora@michaelsonlaw.com)  
8 MICHAELSON & ASSOCIATES, LTD.  
9 2200 Paseo Verde Parkway, Ste. 160  
10 Henderson, Nevada 89052  
11 Ph: (702) 731-2333  
12 Fax: (702) 731-2337  
13 Attorneys for Petitioners

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 IN THE MATTER OF THE GUARDIANSHIP )  
11 OF THE PERSON AND ESTATE OF: )

12 Kathleen June Jones, )

13 An Adult Protected Person. )

Case Number: G-19-052263-A  
Department: B

14 **NOTICE OF ENTRY OF ORDER EXTENDING TEMPORARY GUARDIANSHIP**

15 To: Whom It May Concern:

16 Notice is hereby given that on October 3, 2019, an Order Extending Temporary  
17 Guardianship was entered in the above-titled matter, a copy of said Order is attached hereto.

18 DATED: October 3, 2019.

19 MICHAELSON & ASSOCIATES, LTD.

20 *Lora L. Caindec-Poland*  
21 John P. Michaelson, Esq.  
22 Nevada Bar No. 7822  
23 Lora L. Caindec-Poland, Esq.  
24 Nevada Bar No. 14178  
25 2200 Paseo Verde Parkway, Ste. 160  
Henderson, Nevada 89052

**CERTIFICATE OF SERVICE**

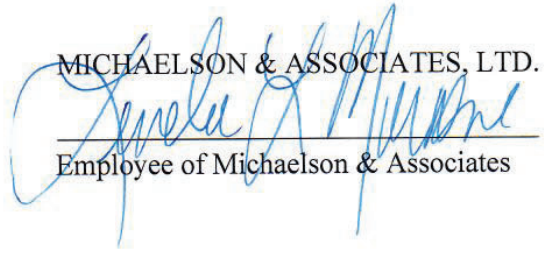
Pursuant to Nevada Rule of Civil Procedure 5(b), the undersigned hereby certifies that on October 3, 2019 a copy of the Notice of Entry of Order Extending Temporary Guardianship and said Order was mailed by regular US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada to the following individuals and/or entities at the following addresses:

Kathleen June Jones 6277 Kraft Avenue Las Vegas, Nevada 89130	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada <a href="mailto:mparra@lacsns.org">mparra@lacsns.org</a>
Matthew C. Piccolo, Esq. PICCOLO LAW OFFICES <a href="mailto:matt@piccololawoffices.com">matt@piccololawoffices.com</a> Co-Counsel for Rodney Gerald Yeoman	Ty E. Kehoe, Esq. KEHOE & ASSOCIATES <a href="mailto:TyKehoeLaw@gmail.com">TyKehoeLaw@gmail.com</a> Attorney for Rodney Gerald Yeoman
Jeffrey P. Luszeck, Esq. Ross E. Evans, Esq. SOLOMON DWIGGINS & FREER, LTD. <a href="mailto:jluszeck@sdfnvlaw.com">jluszeck@sdfnvlaw.com</a> <a href="mailto:revans@sdfnvlaw.com">revans@sdfnvlaw.com</a>  Attorney for Kimberly Jones	Teri Butler 586 N. Magdalena Street Dewey, AZ 86327
Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
Jon Criss 804 Harksness Lane, Unit 3 Redondo Beach, CA 90278	Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832



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Tiffany O'Neal 177 N. Singingwood Street, Unit 13 Orange, CA 92869	Courtney Simmons 765 Kimbark Avenue San Bernardino, CA 92407
Ampersand Man 2824 High Sail Court Las Vegas, Nevada 89117	Division of Welfare and Supportive Services Medicaid Chief Eligibility and Payments 1470 College Parkway Carson City, Nevada 89706

MICHAELSON & ASSOCIATES, LTD.  
  
Employee of Michaelson & Associates

*Steven D. Grierson*

**TGPE**

John P. Michaelson, Esq.  
Nevada Bar No. 7822  
Email: [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)  
Lora L. Caindec-Poland, Esq.  
Nevada Bar No. 14178  
Email: [lora@michaelsonlaw.com](mailto:lora@michaelsonlaw.com)  
MICHAELSON & ASSOCIATES, LTD.  
2200 Paseo Verde Parkway, Ste. 160  
Henderson, Nevada 89052  
Ph: (702) 731-2333  
Fax: (702) 731-2337  
Attorneys for Petitioners

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP  
OF THE PERSON AND ESTATE OF:

Kathleen June Jones,

An Adult Protected Person.

Case Number: G-19-052263-A  
Department: B

Date of Hearing: 10/3/19  
Time of Hearing: 9:00 a.m.

**ORDER EXTENDING TEMPORARY GUARDIANSHIP**  
**DATE OF EXPIRATION: 12/3/2019**

☒ **TEMPORARY GUARDIANSHIP**

- ☐ Person  
☐ Estate ☐ Summary Admin.  
☒ Person and Estate

☐ **GENERAL GUARDIANSHIP**

- ☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☐ **SPECIAL GUARDIANSHIP**

- ☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☐ **NOTICES / SAFEGUARDS**

- ☐ Blocked Account  
☐ Bond Posted  
☐ Public Guardian Bond

At a hearing on October 3, 2019, and upon good cause, this Court hereby orders that the  
temporary guardianship authority of Robyn Friedman and Donna Simmons is in full force and

///

///

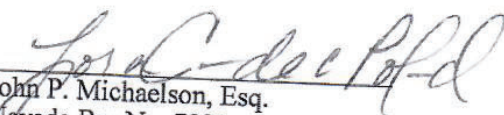
1 effect of the Person and Estate of Kathleen June Jones and is extended until the expiration date  
2 above.

3 DATED: 10/3, 2019.

4   
5 District Court Judge  
6 LINDA MARQUIS

7 Submitted by:

8 MICHAELSON & ASSOCIATES, LTD.

9   
10 John P. Michaelson, Esq.  
11 Nevada Bar No. 7822  
12 Lora L. Caindec-Poland, Esq.  
13 Nevada Bar No. 14178  
14 2200 Paseo Verde Parkway, Ste. 160  
15 Henderson, Nevada 89052  
16 Attorneys for Petitioner  
17  
18  
19  
20  
21  
22  
23  
24  
25





**ORDR**

JEFFREY P. LUSZECK, ESQ., Bar No. 09619  
jluszeck@sdfnvlaw.com  
ROSS E. EVANS, ESQ., Bar No. 11374  
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SOLOMON DWIGGINS & FREER, LTD.  
9060 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
Telephone: (702) 853-5483  
Facsimile: (702) 853-5485

*Attorneys for Respondent Kimberly Jones*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE  
GUARDIANSHIP OF THE PERSON AND  
ESTATE OF:

KATHLEEN JUNE JONES

An Adult Protected Person.

Case No.: G-19-052263-A  
Dept.: B

**Date of Hearing: October 15, 2019**  
**Time of Hearing: 9:00 a.m.**

**ORDER FROM OCTOBER 15, 2019 HEARING**

☐ **TEMPORARY GUARDIANSHIP**

- ☐ Person  
☐ Estate  
☐ Person and Estate

☒ **GENERAL GUARDIANSHIP**

- ☐ Person  
☐ Estate ☐ Summary Admin.  
☒ Person and Estate

☐ **SPECIAL GUARDIANSHIP**

- ☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☐ **NOTICES/SAFEGUARDS**

- ☐ Blocked Account Required  
☐ Bond Required

This matter having come on for hearing before the above entitled Court on October 15, 2019. Present at the hearing were: Jeffrey P. Luszeck, Esq. of the law firm of Solomon Dwiggins & Freer, Ltd. on behalf of Kimberly Jones; Maria L. Parra-Sandoval, Esq. of Legal Aid Center of Southern Nevada, on behalf of Kathleen June Jones, Protected Person; Ty E. Kehoe, Esq. of the law firm Kehoe & Associates, and Matthew C. Piccolo, Esq. of the law firm Piccolo Law Offices, on behalf of Rodney Gerald Yeoman; and John P. Michaelson, Esq. of the law firm Michaelson & Associates, Ltd., on behalf of Robyn Friedman and Donna Simmons (collectively, the "Parties"). After considering the papers and pleadings on file herein and the argument of counsel

**RECEIVED**

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4 2. That on October 24, 2012, Kathleen June Jones executed a Financial Power of  
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6 3. That on November 23, 2012, Kathleen June Jones executed a Last Will and  
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8 guardian over her person and estate, should the need for a guardian ever arise.

9 4. That on September 19, 2019, Robyn Friedman and Donna Simmons filed their *Ex*  
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19 Person and Estate.”

20 6. That on September 23, 2019, this Court entered its Order Granting *Ex Parte Petition*  
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22 Temporary Guardians. On October 3, 2019, this Court extended the temporary guardianship.

23 7. That on October 2, 2019, Rodney Gerald Yeoman, the husband of Kathleen June  
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25 Counter-Petition for Appointment of Temporary Guardian of the Person and Estate and Issuance of  
26 Letters of Temporary Guardianship and Estate and Issuance of Letters of Temporary Guardianship  
27 and Counter-Petition for Appointment of General Guardian of the Person and Estate and Issuance  
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1 of Letters of General Guardianship ("Rodney's Counter-Petition").

2 8. That on October 2, 2019, Kimberly Jones filed her Opposition to *Ex Parte* Petition  
3 for Appointment of Temporary and General Guardian of the Person and Estate; Alternatively,  
4 Counter-Petition for Appointment of Kimberly Jones as Temporary and General Guardian of the  
5 Person and Estate ("Kimberly's Counter-Petition").

6 9. That on October 15, 2019 at the Citation to Appear and Show Cause Hearing,  
7 Kathleen June Jones, by and through her Court appointed Counsel, Maria L. Parra-Sandoval,  
8 advised the Court that it was Kathleen June Jones' desire that Kimberly Jones be appointed as her  
9 client's guardian.

10 Good Cause Appearing Therefore,

11 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Kimberly Jones' Counter-  
12 Petition is hereby GRANTED.

13 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Kimberly Jones is  
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23 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Kimberly Jones shall  
24 investigate the facts and circumstances regarding the purported transfer of real property located at  
25 6277 Kraft Avenue, Las Vegas, Nevada 89130, APN 138-02-511-076, from June Jones to Richard  
26 & Kandi Powell on or around January 16, 2018, and pursue any potential claims and/or resolution  
27 relating to the same.

28



1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Kimberly Jones shall  
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7 visits must be supervised by Kimberly Jones and/or an agent of her choosing so as to ensure the  
8 safety of Kathleen June Jones.

9 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Court approve  
10 payment of attorneys' fees and costs from the guardianship estate to the law firm of Solomon  
11 Dwiggins & Freer, Ltd. at the conclusion of the guardianship proceeding, subject to Court  
12 confirmation.

13 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a return hearing on the  
14 Investigative Reports is hereby scheduled for January 14, 2020, and if necessary, an evidentiary  
15 hearing on the Investigative Reports is scheduled for February 20, 2020.

16 DATED this 25<sup>th</sup> day of November, 2019.


17  
18   
19 DISTRICT COURT JUDGE  
LINDA MARQUIS 


20 Submitted by:

Approved as to Form and Content:  
  
MLPS

21 SOLOMON DWIGGINS & FREER, LTD.

LEGAL AID CENTER OF SOUTHERN  
NEVADA

22  
23 By:   
24 JEFFREY P. LUSZECK, ESQ.  
25 Nevada Bar No. 09619  
ROSS E. EVANS, ESQ.  
26 Nevada Bar No. 11374  
9060 West Cheyenne Avenue  
27 Las Vegas, Nevada 89129

By:   
MARIA L. PARRA SANDOVAL, ESQ.  
Nevada Bar No. 13736  
725 E. Charleston Blvd.  
Las Vegas, NV 89104

*Attorney for Kathleen Jones, Protected Person*

28 *Attorneys for Kimberly Jones*

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~~Approved as to Form and Content:~~

KEHOE & ASSOCIATES

*DISAPPROVED*

By: *3 Kehoe 10-31-19*

TY E. KEHOE, ESQ.

Nevada Bar No. 6011

871 Coronado Center Dr. Ste. 200

Henderson, NV 89052

*Attorney for Rodney Gerald Yeoman*

Approved as to Form and Content:

MICHAELSON & ASSOCIATES, LTD.

By: *[Signature]*

JOHN P. MICHAELSON, ESQ.

Nevada Bar No. 7822

2200 Paseo Verde Parkway, Suite 160

Henderson, NV 89052

*Attorneys for Robyn Friedman and Donna  
Simmons*

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FACSIMILE (702) 853-5485  
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1 Approved as to Form and Content:

2 KEHOE & ASSOCIATES

3  
4 By: 

5 TY E. KEHOE, ESQ.  
6 Nevada Bar No. 6011  
7 871 Coronado Center Dr. Ste. 200  
8 Henderson, NV 89052

9  
10 *Attorney for Rodney Gerald Yeoman*

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MICHAELSON & ASSOCIATES, LTD.

By: 

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*Attorneys for Kimberly Jones*

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE  
GUARDIANSHIP OF THE PERSON AND  
ESTATE OF:

Case No.: G-19-052263-A  
Dept.: B

KATHLEEN JUNE JONES

**NOTICE OF ENTRY OF ORDER**

An Adult Protected Person.

☐ **TEMPORARY GUARDIANSHIP**  
☐ Person  
☐ Estate  
☐ Person and Estate

☒ **GENERAL GUARDIANSHIP**  
☐ Person  
☐ Estate ☐ Summary Admin.  
☒ Person and Estate

☐ **SPECIAL GUARDIANSHIP**  
☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☐ **NOTICES/SAFEGUARDS**  
☐ Blocked Account Required  
☐ Bond Required

PLEASE TAKE NOTICE that an *Order from October 15, 2019 Hearing* was entered in the above-entitled matter on the 25<sup>th</sup> day of November, 2019, a true and correct copy of which is attached hereto.

DATED this 25<sup>th</sup> day of November, 2019.

SOLOMON DWIGGINS & FREER, LTD.

*Jeffrey P. Luszeck*

By: JEFFREY P. LUSZECK, ESQ. (#9619)  
ROSS E. EVANS, ESQ. (#11374)  
9060 West Cheyenne Avenue  
Las Vegas, Nevada 89129

*Attorneys for Kimberly Jones*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25<sup>th</sup> day of November, 2019, pursuant to NRCP 5(b), I caused a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER**, to be served to the following in the manner set forth below:

**Via:**

☐ Hand Delivery  
☐ U.S. Mail, Postage Prepaid  
☐ Certified Mail, Receipt No.: \_\_\_\_\_  
☐ Return Receipt Request  
☒ E-Service through Wiznet

Robyn Friedman and Donna Simmons:  
John P. Michaelson, Esq.  
MICHAELSON & ASSOCIATES, LTD.  
[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)

Kathleen Jones, Adult Protected Person:  
Maria L. Parra Sandoval, Esq.  
LEGAL AID CENTER OF SOUTHERN NEVADA, INC.  
[mparra@lacs.org](mailto:mparra@lacs.org)

Rodney Gerald Yeoman:  
Ty E. Kehoe, Esq.  
KEHOE & ASSOCIATES  
[TyKehoe@gmail.com](mailto:TyKehoe@gmail.com)

Matthew C. Piccolo  
PICCOLO LAW OFFICES  
[matt@piccololawoffices.com](mailto:matt@piccololawoffices.com)

Kimberly Jones  
Geraldine Tomich, Esq.  
James A. Beckstrom, Esq.  
MARQUIS AURBACH & COFFING  
[gtomich@maclaw.com](mailto:gtomich@maclaw.com)  
[jbeckstrom@maclaw.com](mailto:jbeckstrom@maclaw.com)

/s/ Gretta McCall

\_\_\_\_\_  
An employee of SOLOMON DWIGGINS & FREER, LTD.





**ORDR**

JEFFREY P. LUSZECK, ESQ., Bar No. 09619  
jluszeck@sdfnvlaw.com  
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*Attorneys for Respondent Kimberly Jones*

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**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE  
GUARDIANSHIP OF THE PERSON AND  
ESTATE OF:

KATHLEEN JUNE JONES

An Adult Protected Person.

Case No.: G-19-052263-A  
Dept.: B

**Date of Hearing: October 15, 2019**  
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**ORDER FROM OCTOBER 15, 2019 HEARING**

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☐ Estate  
☐ Person and Estate

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16 DATED this 25<sup>th</sup> day of November, 2019.

17  
18  
19 DISTRICT COURT JUDGE  
LINDA MARQUIS

20 Submitted by:

Approved as to Form and Content:  
MLPS

21 SOLOMON DWIGGINS & FREER, LTD.

LEGAL AID CENTER OF SOUTHERN  
NEVADA

22  
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JEFFREY P. LUSZECK, ESQ.  
24 Nevada Bar No. 09619  
ROSS E. EVANS, ESQ.  
25 Nevada Bar No. 11374  
9060 West Cheyenne Avenue  
26 Las Vegas, Nevada 89129

By: Maria Parra Sandoval  
MARIA L. PARRA SANDOVAL, ESQ.  
27 Nevada Bar No. 13736  
725 E. Charleston Blvd.  
Las Vegas, NV 89104

Attorney for Kathleen Jones, Protected Person

28 Attorneys for Kimberly Jones

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~~Approved as to Form and Content:~~

KEHOE & ASSOCIATES

*DISAPPROVED*

By: *[Signature]* 10-31-19

TY E. KEHOE, ESQ.

Nevada Bar No. 6011

871 Coronado Center Dr. Ste. 200

Henderson, NV 89052

*Attorney for Rodney Gerald Yeoman*

Approved as to Form and Content:

MICHAELSON & ASSOCIATES, LTD.

By: *[Signature]*

JOHN P. MICHAELSON, ESQ.

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*Attorneys for Robyn Friedman and Donna  
Simmons*

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Approved as to Form and Content:

KEHOE & ASSOCIATES

By: 

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Nevada Bar No. 6011  
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*Attorney for Rodney Gerald Yeoman*

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By: 

JOHN P. MICHAELSON, ESQ.  
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*Attorneys for Robyn Friedman and Donna  
Simmons*



*Steven D. Grierson*

1 **LETT**  
JEFFREY P. LUSZECK, ESQ., Bar No. 09619  
2 jluszeck@sdfnlaw.com  
ROSS E. EVANS, ESQ., Bar No. 11374  
3 revans@sdfnlaw.com  
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4 9060 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
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Facsimile: (702) 853-5485  
6 *Attorneys for Kimberly Jones*

7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 IN THE MATTER OF THE  
10 GUARDIANSHIP OF THE PERSON AND  
ESTATE OF:

Case No.: G-19-052263-A  
Dept.: B

11 KATHLEEN JUNE JONES

**LETTERS OF GUARDIANSHIP**

12 An Adult Protected Person.

13 ☐ **TEMPORARY GUARDIANSHIP**

- 14 ☐ Person  
15 ☐ Estate  
16 ☐ Person and Estate

☒ **GENERAL GUARDIANSHIP**

- ☐ Person  
☐ Estate ☐ Summary Admin.  
☒ Person and Estate

17 ☐ **SPECIAL GUARDIANSHIP**

- 18 ☐ Person  
19 ☐ Estate ☐ Summary Admin.  
20 ☐ Person and Estate

☐ **NOTICES/SAFEGUARDS**

- ☐ Blocked Account Required  
☐ Bond Required

21 On the 25th day of November, 2019, a Court Order was entered appointing KIMBERLY  
22 JONES as Guardian of the Person and Estate of KATHLEEN JUNE JONES, an Adult Protected  
23 Person. The named Guardian, having duly qualified, is authorized to act and has authority to  
24 perform the duties of such Guardian as provided by law.

25 In testimony of which, I have this date signed these Letters of Guardianship and affixed  
26 the Seal of the Court.

27 DATED this 27 day of November, 2019.

**STEVEN D. GRIERSON**

CLERK OF COURT

*Sydvian Russell*  
**SYDVIAN RUSSELL**

Deputy Court Clerk



**OATH**

I, KIMBERLY JONES residing at 18543 Yorba Linda Blvd., #146, Yorba Linda, CA 92866, whose mailing address is 18543 Yorba Linda Blvd., #146, Yorba Linda, CA 92866, solemnly affirm that I will faithfully perform the duties of Guardian according to law. I affirm that any matters stated in any petition, document or court proceeding are true of my own knowledge or if any matters are stated on information or belief, I believe them to be true. I affirm I will follow the Protected Person's Bill of Rights to the greatest extent possible.

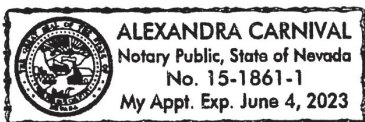
I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

EXECUTED this 26<sup>th</sup> day of November, 2019.

  
KIMBERLY JONES

STATE OF NEVADA           )  
                                          )ss:  
COUNTY OF CLARK        )

Signed and sworn to before me on this 26<sup>th</sup> day of November, 2019 by KIMBERLY JONES.



  
NOTARY PUBLIC, in and for said  
State and County



**Marquis Aurbach Coffing**

Geraldine Tomich, Esq.

Nevada Bar No. 8369

Kathleen A. Wilde, Esq.

Nevada Bar No. 12522

James A. Beckstrom, Esq.

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*Attorneys for Kimberly Jones*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

In the Matter of the Guardianship of the Person  
and Estate of,

Case No.: G-19-052263-A

Dept. No.: B

KATHLEEN JUNE JONES,

Protected Person.

**ACCOUNTING**

COMES NOW, Kimberly Jones, Guardian of the Person and Estate of Kathleen June Jones ("Kim"), by and through the law firm of Marquis Aurbach Coffing, and hereby submits her First Annual Accounting, a copy of which is attached hereto.

DATED this 21<sup>st</sup> day of December, 2020.

MARQUIS AURBACH COFFING

By /s/ Kathleen A. Wilde

Geraldine Tomich, Esq.

Nevada Bar No. 8369

Kathleen A. Wilde, Esq.

Nevada Bar No. 12522

James A. Beckstrom, Esq.

Nevada Bar No. 14032

10001 Park Run Drive

Las Vegas, Nevada 89145

*Attorneys for Kimberly Jones*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Accounting was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 21<sup>st</sup> day of December, 2020. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:<sup>1</sup>

Ty E. Kehoe, Esq.  
KEHÖE & ASSOCIATES  
871 Coronado Center Drive, Ste. 200  
Henderson, NV 89052

Matthew C. Piccolo, Esq.  
PICCOLO LAW OFFICES  
2450 St. Rose Pkwy., Ste. 210  
Henderson, NV 89074

Laura A. Deeter, Esq.  
GHANDI DEETER BLACKHAM  
725 S. 8th Street, Ste. 100  
Las Vegas, NV 89101

*Attorneys for Richard and Candice Powell, Rodney Gerald Yeoman*

Maria L. Parra-Sandoval, Esq.  
LEGAL AID OF SOUTHERN NEVADA  
725 E. Charleston Blvd.  
Las Vegas, NV 89104

*Attorney for Kathleen June Jones Protected Person*

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

N/A

  
An Employee of Marquis Aurbach Coffing

<sup>1</sup> Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

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In Proper Person

IN THE Eighth JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF Clark

In the Matter of the Guardianship )  
of the ☐ Estate )  
☒ Person and Estate )  
of: )  
KATHLEEN JUNE JONES )  
A(n) ☐ Minor )  
☒ Adult )

CASE NO. G-19-052263-A

DEPT. NO. B

**ACCOUNTING**

[First, Second, Third, <sup>1</sup>\_\_\_\_\_] or Final Circle of fill-in appropriate number

01.30.2020 through 11.23.2020  
BEGINNING DATE ENDING DATE

DO NOT FILL IN GRAY AREAS

RECAPITULATION (RECAP)	Subtotal	Total
Beginning balance (balance brought forward from inventory or previous accounting)		\$
+ Total from Schedule A	\$ 28,960.00	
- Total from Schedule B	\$ (51,507.25)	
Ending Balance for this accounting period		\$ (22,547.25)

<sup>1</sup> Final is circled if the guardianship has been terminated or this is the last accounting of this guardian.



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<b>Schedule A</b>	<b>Subtotal</b>	<b>Total</b>
<b>Income/ Receipts/Increases in Value</b>		
Total Income (from <i>Worksheet 1</i> ):	\$ 16,560	
Receipts or Refunds Received (from <i>Worksheet 2</i> ):	\$ 12,400	
Increases in Value of Assets (from <i>Worksheet 3</i> ):	\$	
Gains of Sales of Assets (from <i>Worksheet 4</i> ):	\$	
<b>Total Increase to Estate:</b>		<b>\$ 28,960</b>

***Worksheet 1, Income/Interest<sup>2</sup>***

<b>Description</b>	<b>Amount</b>
Social Security Income	\$ 15,360
Miscellaneous Income (COVID-19 from Government)	\$ 1,200
	\$
	\$
	\$
<b>TOTAL</b>	<b>\$ 16,560</b>

***Worksheet 2, Receipts/Refunds Received<sup>3</sup>***

<b>Description</b>	<b>Amount</b>
Rental Receipts: Anaheim Property	\$ 9,900
Tenant Security Deposit	\$ 2,500
	\$
	\$
<b>TOTAL</b>	<b>\$ 12,400</b>

<sup>2</sup> Income/Interest may come from but is not limited to: social security; wages from employment; and interest income.

<sup>3</sup> Receipts/Refunds may include, but are not limited to: retirement payments, annuity payments, rental receipts, loan payment receipts, collected receivables, refunds on utility deposits, refunds on home/apartment rental deposits.



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**Worksheet 3, Increases in Value of Assets<sup>4</sup>**

Description	Amount
	\$
	\$
	\$
	\$
<b>TOTAL</b>	\$

**Worksheet 4, Gains on Sales of Assets<sup>5</sup>**

Description	a) Sales Price	b) Recorded Value	c) Amount of Gain [a – b = c]
			\$
			\$
			\$
			\$
<b>TOTAL</b>			\$

<sup>4</sup> Increases in values of assets may include, but are not limited to: real property, antiques, collectibles; gains in value of investment accounts, stocks, or other securities.  
<sup>5</sup> If an asset was sold for more than its recorded value in the inventory or the last accounting, the amount received above that value is a gain on the sale of an asset.

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<b>Schedule B</b>	Subtotal	Total
<b>Expenses/Disbursements/Decreases in Value</b>		
Disbursements (from <i>Worksheet 5</i> ):	\$ 51,507.25	
Decreases in Value of Assets (from <i>Worksheet 6</i> ):	\$	
Losses on Sales of Assets (from <i>Worksheet 7</i> ):	\$	
<b>Total Decreases to Estate:</b>		\$

***Worksheet 5, Expenses/Disbursements***

Description	Amount
Medical	\$ 900.26
Clothing	\$ 258.98
Personal Hygiene, Pet Care, & Cleaning Supplies	\$ 1,355.48
Bank Charges & Fees	\$ 110.00
Travel	\$ 306.00
Donations/Gifts	\$ 40.30
Office Supplies & Software	\$ 112.55
Transportation Expenses	\$ 1,331.44
Insurance	\$ 2,023.62
Interest Paid (on credit card)	\$ 569.20
Meals & Groceries	\$ 5,200.71
Books/Newspaper Subscription	\$ 264.15
Legal & Professional Services	\$ 1,920.00
Repairs & Maintenance	\$ 1,038.40
Utilities	\$ 4,774.80
Rental Property Expenses	\$ 31,301.36
<b>TOTAL</b>	<b>\$ 51,507.25</b>

**Worksheet 6, Decreases in Value of Assets<sup>6</sup>**

Description	Amount
	\$
	\$
	\$
	\$
	\$
	\$
	\$
<b>TOTAL</b>	\$

**Worksheet 7, Losses on Sale of Assets<sup>7</sup>**

Description	a) Recorded Value	b) Sales Price	c) Amount of Loss [a-b=c]
			\$
			\$
			\$
			\$
			\$
			\$
			\$
<b>TOTAL</b>			\$

<sup>6</sup> Decreases in value of assets may include, but is not limited to: real property, antiques, collectibles, investment accounts, stocks, securities, motor vehicles.

<sup>7</sup> If an asset is sold for less than its recorded value in the inventory or last annual accounting, the amount which is less than the recorded value is the loss on the sale of the asset.

## Assets of the Estate at the Ending Date of the Accounting

	Value of Ward's Interest
<b><u>A. REAL PROPERTY</u></b>	
Description	
1. House @ 1054 South Verde Street, Anaheim, CA 92805	\$ 610,000
2. _____	\$ _____
3. _____	\$ _____
<b><u>B. PERSONAL PROPERTY</u></b>	
<b>Cash, Checking and Savings Accounts, other Accounts (List)</b>	
4. Bank of America account x7492	\$ 29,573.69
5. Bank of America account x8243	\$ 2,500.85
6. _____	\$ _____
<b>Other Interest, Etc. (Describe)</b>	
7. _____	\$ _____
8. _____	\$ _____
<b>Notes, Bonds, Securities, Debts, Etc., (List Name &amp; Address of Debtor)</b>	
9. Tenant Security Deposit	\$ (2,500)
10. Anaheim, CA Mortgage	\$ (160,752.11)
11. Citibank Credit Card account x1157 (paid off on 11.23.2020)	\$ (0.00)
12. _____	\$ _____
<b>Vehicles (List)</b>	
13. _____	\$ _____
14. _____	\$ _____
15. _____	\$ _____
<b>Miscellaneous Personal Property (Describe)</b>	
16. _____	\$ _____
17. _____	\$ _____
18. _____	\$ _____
19. _____	\$ _____
<b>Other (Describe)</b>	
20. _____	\$ _____
21. _____	\$ _____
22. _____	\$ _____
<b>TOTAL</b>	<b>\$ 478,822.43</b>

VERIFICATION

STATE OF NEVADA )  
COUNTY OF CLARK )ss.

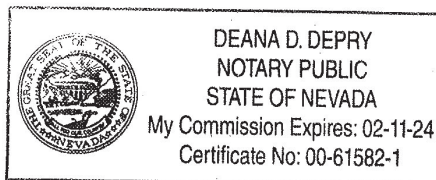
I KIMBERLY JONES, being first duly sworn under penalty of perjury, hereby deposes and say:

That I am the Petitioner named in the foregoing Accounting and I have read the same and know the contents thereof. The Report is true to the best of my own knowledge, except for those statements made upon information and belief; and as to those statements, I believe them to be true.

  
KIMBERLY JONES

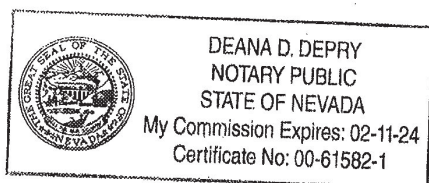
SUBSCRIBED and SWORN to  
before me by KIMBERLY JONES  
this 21<sup>st</sup> day of December, 2020


  
NOTARY PUBLIC

ACKNOWLEDGMENT OF PETITIONER

STATE OF NEVADA )  
COUNTY OF CLARK )ss.

On the 21<sup>st</sup> day of December, 2020, before me, the undersigned Notary Public in and for the said County and State, personally appeared KIMBERLY JONES known to me to be the person described in and who executed the forgoing instrument, and who acknowledge to me that she did so freely and voluntarily and for the uses and purposes therein mentioned.



  
DEANA D. DEPRY





**PET**

MICHAELSON & ASSOCIATES, LTD.  
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john@michaelsonlaw.com  
Ammon E. Francom, Esq.  
Nevada Bar No. 14196  
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Henderson, Nevada 89052  
Ph: (702) 731-2333  
Fax: (702) 731-2337  
*Attorneys for Robyn Friedman  
and Donna Simmons*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP ) Case Number: G-19-052263-A  
OF THE PERSON AND ESTATE OF: ) Department: B  
)  
Kathleen June Jones, )  
)  
An Adult Protected Person. )  
)

**HEARING REQUESTED**

**VERIFIED PETITION FOR COMMUNICATION, VISITS,  
AND VACATION TIME WITH PROTECTED PERSON**

<input type="checkbox"/> TEMPORARY GUARDIANSHIP	<input checked="" type="checkbox"/> GENERAL GUARDIANSHIP
<input type="checkbox"/> Person	<input type="checkbox"/> Person
<input type="checkbox"/> Estate <input type="checkbox"/> Summary Admin.	<input type="checkbox"/> Estate <input type="checkbox"/> Summary Admin.
<input type="checkbox"/> Person and Estate	<input checked="" type="checkbox"/> Person and Estate
<input type="checkbox"/> SPECIAL GUARDIANSHIP	<input type="checkbox"/> NOTICES / SAFEGUARDS
<input type="checkbox"/> Person	<input type="checkbox"/> Blocked Account
<input type="checkbox"/> Estate <input type="checkbox"/> Summary Admin.	<input type="checkbox"/> Bond Posted
<input type="checkbox"/> Person and Estate	<input type="checkbox"/> Public Guardian Bond

COME NOW, pursuant to NRS 159.328(1)(d) and NRS 159.332, Robyn Friedman and Donna Simmons ("Petitioners" or "Robyn" and "Donna"), as family members and interested parties in this matter, by and through their attorneys at Michaelson & Associates, Ltd., and file this Verified Petition for Communication, Visits, and Vacation Time with Protected Person to

ask for this Court's assistance ensuring consistent contact between Kathleen June Jones ("protected person" or "Ms. Jones") and her daughters, Robyn and Donna, in addition to other family members of Ms. Jones beyond Ms. Jones' guardian and daughter, Kimberly Jones ("Kim"), as follows:

**CONTEXT AND BACKGROUND RELEVANT TO THIS PETITION**

**A. The Court and Court-Appointed Counsel Requested that Petitioners File this Petition.**

1. An ongoing focal point in this case has been the need for the guardian to coordinate and facilitate communication, visits, and vacation time between Petitioners, other family members, and Ms. Jones, the protected person.

2. Despite a truly agonizing amount of effort and expense to cajole, convince, request, supplicate a recalcitrant guardian to humanely help the protected person communicate and arrange visits with the rest of her family, the guardian has been unwilling to do so. Despite the Court's admonishment on many occasions, the guardian has continued to be passive aggressive, manipulative and controlling.

3. With the guardian continuing to refuse to alter course without the Court's intervention, court-appointed counsel for Ms. Jones requested that Petitioners file this Petition at the September 17, 2020 hearing so she could discuss it with her client. Petitioners have tried to raise these issues with court-appointed counsel previously, including a recent hour-long phone conference. These efforts have not been helpful because court-appointed counsel asserts that there is nothing she can do, although the issues have been presented to court-appointed counsel and guardian's counsel many times.

4. In response to the continued gridlock, the Court also requested that Petitioners file this Petition after hearing some of the difficulties that are detailed hereinbelow.

**B. Petitioners Only Seek a Course Correction.**

5. This Petition is NOT to ask this Court to remove Kim as guardian. However,

1 Petitioners are forced to bring this petition to compel Kim, as guardian, to be more humane; to  
2 provide the same kind of logistical support to Ms. Jones' family as Kim provides to Ms. Jones'  
3 medical professionals, legal aid attorney, this Court, friends, neighbors, gardeners, dry cleaners,  
4 the veterinarian and the dog groomer.

5         6.       In short, this Petition is a request for a course correction for Kim, as the guardian  
6 of Ms. Jones, to help Kim follow through with protecting Ms. Jones' right, among others, as  
7 recognized in the Protected Person's Bill of Rights, to "[r]eceive telephone calls and personal  
8 mail and have visitors . . . ." NRS 159.328(1)(n).

9         7.       This Petition requests this Court to issue an order identifying the calendar,  
10 availability or procedure that is effective and works best for Ms. Jones, and for Kim, to facilitate  
11 the communication, visits and vacation time that Ms. Jones should have with Robyn and Donna,  
12 and Ms. Jones' other family members. Petitioners are open to whatever calendaring procedure  
13 works best for Ms. Jones that also takes into consideration Petitioners' availability and ability to  
14 take time off from work and caring for their own families and children. Many times, any efforts  
15 by Kim to coordinate communication or visits between Ms. Jones and Robyn or Donna are last  
16 minute, or with no notice whatsoever. Petitioners simply need reasonable, established  
17 timeframes to work within so they can plan accordingly to have time with Ms. Jones.

18         8.       Petitioners do not desire to compel Ms. Jones to visit with them. Rather, they  
19 seek a routine or series of windows of opportunity so that all sides can plan to be available to  
20 accomplish the visits. If Ms. Jones is not feeling well or ever desires not to have a visit with  
21 Petitioners, Petitioners would of course respect that, but a framework needs to be in place, rather  
22 than a directive from Kim to "just call mom."

23         9.       As stated in the September 17, 2020 hearing, this Petition is necessary due to  
24 strong disagreements over Kim's actions and inactions (listed below) regarding Ms. Jones'  
25 communication and time with family members, the discussion of which prompted the Court to

1 invite Petitioners to file this Petition. Furthermore, this Petition is necessary because the  
2 communications and visits are so scarce that Petitioners cannot even speak to whether Ms. Jones  
3 is secure and safe. Kim’s behavior has effectively denied Petitioners access to Ms. Jones to the  
4 point where Petitioners really do not know what is going on with their mother.

5 10. In the Guardianship Care Plan for Kathleen June Jones filed on October 2, 2019,  
6 Gina Jolliff, MSG, CMC, Aging Life Care Professional, Aging Perspectives, LLC, included the  
7 poignant statement, “[c]ommunication has been an ongoing battle in the midst of Kathleen’s  
8 situation.”

9 11. This family, and Ms. Jones most of all, need this Court’s assistance resolving  
10 these difficulties because, as described above, attempts outside of Court have not been  
11 successful.

12 **C. The Requested Relief is Necessary Because Ms. Jones Lacks Capacity to Coordinate**  
13 **Visits and Vacations on Her Own.**

14 12. Notably, Ms. Jones’ lack of capacity is the reason why this guardianship is in  
15 place and Ms. Jones is a protected person. Examples of her incapacity include Ms. Jones cannot  
16 operate her phone without assistance, has a severely impaired memory, and is often disoriented  
17 as to time, including the year, month, week and hour.

18 13. On many occasions, Ms. Jones voiced her desire to meet Robyn and her family  
19 on the phone to Robyn. When Robyn asks when they can meet, Ms. Jones hesitates and then  
20 says she will call Robyn to set something up. However, invariably, Ms. Jones does not call,  
21 possibly because she simply does not remember to do so. When Robyn appeals to Kim for  
22 assistance in coordinating the meetings, Kim typically ignores the communications for a time  
23 and then eventually tersely refers Robyn back to their mother, Ms. Jones, to make the  
24 arrangements directly as if Ms. Jones realistically can carry through on any planning to set up a  
25 visit—continuing the cruel cycle.

1           14.     Kim’s one-line text messages do not help accomplish visits, not even with Robyn,  
2 who lives in the same city but still only gets limited visits with Ms. Jones. Robyn possess  
3 numerous text messages that show how poorly Kim communicates when it comes to helping Ms.  
4 Jones have visits with family members. These text messages would show only the tip of the  
5 iceberg when it comes to what it has been like for the last nine (9) months trying to work with  
6 Kim to have visits with Ms. Jones.

7           15.     Attempting to work directly with the protected person to set up communication  
8 and family visits has been like a cruel hoax. Petitioners already knew that such efforts were futile  
9 based on months of experience with their mother and the guardian. However, as an “nth” degree  
10 effort to show cooperation, Petitioners have attempted exactly what the guardian, the guardian’s  
11 attorney and the LACSN attorney claim will work. They have called the protected person  
12 directly attempting to setup visitation. This simply does not work due to Ms. Jones’ limitations  
13 and it deprives Ms. Jones of time with family other than Kim.

14           16.     Notably, Kim is willing to plan in advance visits and communication between  
15 Ms. Jones and Teri Butler, Ms. Jones daughter that lives in Arizona. Kim does not give Teri last  
16 minute notice or phone calls that are cut short because Kim and Teri are close. Other family  
17 members, on the other hand, do get last minute notice; terse, vague text messages; and phone  
18 calls that are cut short.

19           17.     Ms. Jones is cognitively incapable of reliably and accurately transferring visit  
20 information to anyone or remembering to act on it herself.<sup>1</sup> The time for Ms. Jones to have a  
21 Guardian Ad Litem appointed may have come so she can have someone appointed to act in her  
22 best interest, rather than as directed. One example of how the client-directed model that the Legal  
23

---

24           <sup>1</sup> Although it has been and will be argued that Ms. Jones has capacity to manage her own  
25 calendar, communications, visits, and vacations, the Court has yet to hear that directly from Ms. Jones.



1 Aid Center of Southern Nevada (by whom court-appointed counsel is employed) relies upon is  
2 currently failing Ms. Jones is that it is not at all clear that Ms. Jones is able to direct the currently  
3 pending appeal, even though it is being conducted under the auspice that she directed it.

4 18. Additionally, under the Protected Person's Bill of Rights, NRS 159.328(1)(i), Ms.  
5 Jones has the right to "be granted the greatest degree of freedom possible," but that freedom is  
6 also limited in the same provision inasmuch as it is "consistent with the reason for a  
7 guardianship." Due to her limitations, combined with all her family's love and support for Ms.  
8 Jones, one reason for this guardianship is for Ms. Jones to receive the same kind of assistance  
9 calendaring and having time with family as she does calendaring and keeping medical  
10 appointments, Court hearings, or visits with her legal aid attorney.

11 19. Unlike in almost every other guardianship case counsel for Petitioners has been  
12 involved in, in this matter, the court-appointed attorney maintains she is powerless to affect any  
13 change. In most cases, seeing this difficulty, court-appointed counsel would be an advocate for  
14 the guardian to be more humane.

15 20. A simple canvass of Ms. Jones by this Court will show her limitations, and the  
16 need she has for assistance with communication, visits and vacation time with loved ones.  
17 Indeed, this is important because there is a strong disconnect between what has been presented  
18 to the Court regarding Ms. Jones' capacity and desires as those pertain to visits and  
19 communication, what has been expressed between Ms. Jones and Petitioners, and what has  
20 occurred in practice.

21 21. Examples of Ms. Jones' limiting memory loss include: (1) Ms. Jones' court-  
22 appointed attorney has stated on the record to this Court that Ms. Jones does not remember that  
23 she no longer owns the Kraft House, despite the fact that her counsel has repeatedly advised her  
24 of the loss of her property; (2) Ms. Jones had no recollection of the restaurant Ventano where  
25 she was married when Robyn drove her there; (3) Ms. Jones was confused as to whom she

1 married in the restaurant Ventano; (4) Kim handles the scheduling of all of Ms. Jones' medical  
2 appointments, reminds Ms. Jones when they are to occur, makes sure Ms. Jones is dressed for  
3 the appointments, and takes Ms. Jones to and from those appointments, as Kim should as a good  
4 guardian; and (5) upon information and belief, Kim does the same for Ms. Jones' regarding Court  
5 hearings and visits with her legal aid counsel. Petitioners simply ask that an order and calendar  
6 issue for Kim to do similarly for Ms. Jones' communication, visits and vacation time with  
7 Robyn, Donna and other people that also care about Ms. Jones, as she does for Ms. Jones'  
8 medical, Court and other appointments.

9       22.     Notably, Robyn is in possession of a voice recording of Ms. Jones where she is  
10 heard struggling to operate her cell phone.

11       23.     In a recent phone conference with Ms. Jones' legal aid attorney, the legal aid  
12 attorney expressed repeatedly how well she thinks Ms. Jones is doing, stating repeatedly that she  
13 has been participating in the refinance of her house and is personally directing an appeal to the  
14 Nevada Supreme Court of an attorney fee award. Counsel for Ms. Jones suggested a  
15 guardianship is not necessary.

16       24.     In light of Ms. Jones' memory difficulties, her limitations, and communications  
17 with Ms. Jones' counsel, Petitioners are utterly dismayed that Ms. Jones' counsel has considered  
18 or is considering asking this Court to terminate her guardianship and revert back to a situation  
19 where Kim, as agent nominated in a power of attorney, will be responsible to care for Ms. Jones'  
20 person and finances without Court supervision and oversight. Kim has stated that she would  
21 prefer to handle this case in California where she is more familiar with the courts. However, a  
22 power of attorney situation did not work for Ms. Jones before, and it will not work now.  
23 Petitioners are especially fearful that such a request to return to a power of attorney situation  
24 might take place after Kim and Ms. Jones relocate to California and the issue is presented to a  
25 California court that is not familiar with the history of this case. Ms. Jones' situation requires

1 more transparency and accountability than a power of attorney situation can offer, especially the  
2 court oversight that has been and will continue to be required in this case.

3 **D. Kim's Actions Since the May Agreement Show why the Court's Intervention is**  
4 **Necessary.**

5 25. During a months-long period prior to May 19, 2020, Petitioners and other family  
6 members had very little contact and time with Ms. Jones. Thereafter, because direct  
7 communications by family members with the guardian are futile, many attorneys became  
8 involved and a staggering amount of meet and confer time, money and effort was expended to  
9 get Kim, as guardian, to coordinate simple, intuitive communication and visits between  
10 Petitioners, other family members and Ms. Jones.

11 26. After causing the expense of vast resources, on May 19, 2020, Kim, through  
12 counsel, confirmed an agreement for communication, visits and vacation time ("May  
13 Agreement") Notably, however, the confirmation email was riddled with statements such as (1)  
14 "Of course, June is still her own person and for some reason if she doesn't want to go with Robyn  
15 that is something Maria [Ms. Jones' counsel] can assist with;" and (2) "Again, this isn't a custody  
16 battle and I don't want to minimize the fact that June still has a right to control how she spends  
17 her days;" and (3) "Again, subject to June wanting to do this . . . ."

18 27. Unfortunately, Kim did not adhere to the confirmed May Agreement. Some  
19 specific examples of Kim's actions and/or inactions relevant to communication, visits and  
20 vacation time are as follows:

- 21 a. Kim did not call Robyn on behalf of Ms. Jones on Tuesdays and/or Fridays at or  
22 around 6 p.m. as she agreed. Rather, Kim continued to doggedly insist that Robyn  
23 call Ms. Jones herself, thereby removing any possibility of Kim, as guardian,  
24 helping Ms. Jones achieve the visits and communication. Presumably, Kim does  
25 not dismissively tell other people to "just call June" when they reach out to Kim to  
get an appointment with Ms. Jones or to speak with Ms. Jones, including the Court,  
medical providers, Ms. Jones' court-appointed attorney, friends, neighbors,  
gardeners, dry cleaners, the veterinarian and the dog groomer.

- 1 b. Upon information and belief, because Ms. Jones does not keep her phone with her  
2 or return texts to Robyn—presumably because she lacks capacity or does not  
3 remember to do so—it is Kim that keeps track of Ms. Jones mobile phone including  
4 calls and text messages and then assists Ms. Jones to call or text people back.
- 5 c. Upon information and belief, Kim disabled Facetime on Ms. Jones’ phone. Now,  
6 no one can Facetime Ms. Jones except through Kim’s phone. Upon information and  
7 belief, Ms. Jones cannot re-enable Facetime on her own phone or initiate Facetime  
8 calls.
- 9 d. When Robyn, her husband, and their son visit Ms. Jones at her home, Kim remains  
10 at the house, hovering, interrupting the visit, keeping the atmosphere tense, and  
11 essentially turning their visit into an uncomfortable, supervised visit. During one  
12 visit on July 22, 2020, Robyn, her husband, and their then three-year-old son were  
13 visiting with Ms. Jones at Ms. Jones’ home when Kim lost her temper and became  
14 verbally aggressive with Ms. Jones. While getting very close physically to Ms.  
15 Jones, Kim repeatedly demanded that Ms. Jones answer whether she wanted to go  
16 to Palm Springs for a week with Robyn. Ms. Jones replied that she did while  
17 shrinking back into the couch.
- 18 e. When Robyn pleaded with Kim to stop her behavior, Kim turned her anger on  
19 Robyn, and shouted her, her husband and their son out of Ms. Jones’ home. The  
20 incident upset and confused Ms. Jones and Ms. Jones’ three-year-old grandson,  
21 who continued to bring up the incident and ask questions about it one week later.  
22 The six-year-old stated that Kim’s actions made him feel “not too good,” and that  
23 he still wanted to be around grandma but not Kim.
- 24 f. Moreover, the May Agreement set aside the last week of July (July 26-August 1,  
25 2020) as a time for Robyn to take Ms. Jones on vacation. During a visit on July  
22, 2020, Robyn and Ms. Jones planned to go to Palm Springs the following week  
(the last week of July) on vacation. Two days after the visit, at approximately  
6:20 p.m. on Friday, July 24, 2020, Kim facilitated a call from Ms. Jones to Robyn  
where Robyn learned that Kim and Ms. Jones were actually in Arizona to visit  
Ms. Jones’ other daughter, Teri. Robyn later learned that they stayed in Arizona  
until Wednesday, July 29, 2020. While it is great that Teri got time with Ms.  
Jones, Kim’s sudden trip to Arizona with Ms. Jones destroyed Robyn’s planned  
family vacation with Ms. Jones. While Kim may argue that Robyn failed to  
communicate with Kim, the reality is that (1) the last week of July was already  
allotted to Robyn and Ms. Jones, and (2) Kim did not communicate the Arizona  
visit to Robyn until after she and Ms. Jones were already in Arizona. While Ms.  
Jones can change her mind, communication is key to let other people know that  
her plans have changed.
28. Furthermore, Kim helps Ms. Jones make it to Ms. Jones’ medical appointments,  
Court hearings and legal aid attorney appointments and phone calls. Kim also manages

1 appointments, drop-offs, etc. with service providers such as Ms. Jones' gardeners, veterinarian,  
2 dog groomer, dry cleaners and people who care for Ms. Jones when Kim is not available. Kim  
3 even helps Ms. Jones visit with neighbors. Ms. Jones does not handle any of these things on her  
4 own.

5 29. In light of this, it is very hard to understand that Kim and her counsel began  
6 insisting that Robyn and Donna "quit treating June like a child" and coordinate directly and  
7 exclusively with Ms. Jones regarding visits and communication.

8 30. This "just call mom" plan does not work, and only results in missed visits and  
9 vacations because Ms. Jones' does not have the necessary capacity to coordinate visits or reliable  
10 communication. Ms. Jones does not initiate any visits and only sparsely calls, upon information  
11 and belief, with the help of Kim. When contact is made and Ms. Jones is asked if she would like  
12 to meet, she invariably says, "Yes." When asked when and where, Ms. Jones will say, "I'll get  
13 back with you," – but she never does. Ms. Jones can't remember to call and/or lacks the  
14 wherewithal to deal with Kim on expressing her desires for visits and communication.

15 31. Time with family is becoming ever-more precious as Ms. Jones' memory  
16 continues to decline, both for Ms. Jones and for those who care about her.

17 32. It is in Ms. Jones' best interest to have ongoing, consistent telephone calls, video  
18 chats, and in-person contact with Robyn, Donna and Ms. Jones' other supportive family  
19 members.

20 **F. Kim's Actions Before the May Agreement also Show why the Court's Intervention is**  
21 **Necessary.**

22 33. Prior to the May Agreement, Kim took Ms. Jones to Arizona on another occasion  
23 that similarly and intentionally interfered with a planned visit with Ms. Jones. On that occasion,  
24 Donna, who lives in California, had a long-planned visit with Ms. Jones in Las Vegas that Donna  
25 confirmed repeatedly with Kim before Donna traveled from California with her family to Las



1 Vegas. Despite Kim's confirmations, including on the night before the planned visit, Donna and  
2 her family arrived in Las Vegas to find that Kim had instead decided to take Ms. Jones to  
3 Arizona. Despite the plans and confirmations, Donna and her entire family were prevented from  
4 seeing Ms. Jones.

5 34. Another day, Robyn picked up Ms. Jones from her house and they walked from  
6 the front door to Robyn's vehicle which was parked at the curb in front of Ms. Jones' home.  
7 Robyn asked Ms. Jones if she had eaten. Ms. Jones responded that she did not remember. Ms.  
8 Jones' also stated she needed to use the bathroom, whereupon Ms. Jones remained seated in the  
9 car, parked at the curb in front of the home and Robyn approached the front door, no more than  
10 two minutes after first walking to the curb. Robyn found the door of Ms. Jones' home was locked.  
11 Robyn knocked and also texted Kim. Kim did not answer the door and Kim did not respond to  
12 Robyn's texts for over two to three hours, even though Kim's vehicle was still at the property.  
13 Ms. Jones was locked out of her own house. Robyn was unable to confirm if Ms. Jones had eaten  
14 and had to take her elsewhere to use a bathroom. Even after their visit that day concluded, Ms.  
15 Jones was still locked out of her house for approximately 30 minutes until Kim responded to  
16 Robyn's texts and calls.

17 35. During another timeframe, Robyn texted Kim repeatedly asking if Ms. Jones'  
18 physicians answered the question whether the altitude at Brian Head, Utah would cause Ms.  
19 Jones health issues. Upon information and belief, Kim attends all of Ms. Jones' medical  
20 appointments and is in regular contact with her medical providers and knows how to reach them  
21 with questions. Kim would not provide a straight answer for weeks. Again, this incident is  
22 memorialized in text messages which could be provided if need arises.

23 ///

24 ///

25 ///

**G. Kim's Failure to Communicate Regarding Gerry Yeoman's Death and Her Taking Ms. Jones to California Rather Than Attending Court Hearings Underscore the Necessity for Court Intervention.**

36. As discussed at the September 17, 2020 hearing, Kim's poor communication is highlighted by the fact that Ms. Jones' court-appointed counsel was the one who notified Ms. Jones that her husband, Gerry Yeoman, passed away. This is something Kim should have handled, and Kim should have ensured that other family members were advised of the death and present when she notified Ms. Jones of the death, so all could offer support to Ms. Jones in a very difficult and potentially emotional time.

37. Kim knew about Mr. Yeoman's passing on or about September 1, 2020 because Kim's attorney received the Supplemental Program Status Report filed into the A-case that day reporting Mr. Yeoman's death. Even still, neither Robyn, nor Donna knew about Mr. Yeoman's passing until their counsel discovered it the day of the September 17, 2020 hearing while reviewing the real property/A-case associated with this case.

38. More recently stands the fact that neither Kim nor Ms. Jones attended the September 17, 2020 hearing. When Ms. Jones' whereabouts were questioned, Kim's attorney represented that Ms. Jones was in Nevada. As it turns out, that assertion was incorrect. Kim and Ms. Jones were in California for at least six days but had not alerted anyone to their visit until after it was discovered they were there which suddenly precipitated a flurry of activity on Kim's behalf to facilitate a last-minute visit with Donna.

39. That day, Kim and Ms. Jones were in California at an RV Park. They had previously advised Ms. Jones' court-appointed counsel at Legal Aid of the trip in a voicemail on or about September 11, 2020. It appears Kim did not even advise her own counsel of her whereabouts, much less Ms. Jones' 2 children, 5 grandchildren and 2 great-great-grandchildren that live nearby in California. It took lawyer-intervention at and after a court hearing to prompt Kim (not Ms. Jones, oddly, because according to Kim Ms. Jones is fully capable of handling all

1 her own scheduling, travel and visit issues) to communicate with Ms. Jones' daughter Donna,  
2 who had not received a call from Ms. Jones in a very long time because Ms. Jones cannot reliably  
3 operate or remember to operate her phone. Petitioners have a video showing Ms. Jones' inability  
4 to use her phone which can be provided for review.

5 40. Again, Kim's intentional lack of compassionate, orderly and timely  
6 communication almost caused Donna to not see Ms. Jones at all while Kim and Ms. Jones were  
7 very close to her location in California. Only after the September 17, 2020 hearing, the Court  
8 statement to file this Petition, and the discovery that Kim was in California with Ms. Jones did  
9 Kim act so that Ms. Jones could have a visit with Donna, who had not seen her mother, Ms.  
10 Jones, in a long time. To have a very short visit with Ms. Jones, Donna dropped everything and  
11 went to see her mother at 7:00 p.m. at night. Donna did this even though Ms. Jones usually goes  
12 to bed around that time, just to have some time with her mother. Donna met Kim and Ms. Jones  
13 at a freeway exit. As they decided where to get something to eat, Kim made it clear to Donna  
14 that because of Ms. Jones' difficulty making decisions, Donna should only give Ms. Jones two  
15 options to consider in order for her to be able to make a choice. The visit, for sure, could have  
16 been much better for Ms. Jones and Donna. Furthermore, Kim cost Ms. Jones' the opportunity  
17 to see the rest of her family in California, who are very close and often meet together – and who  
18 with advanced notice, could have planned to see their mother/grandmother for the first time in a  
19 long time. One wonders if this hectic, last minute, visit would have even happened had not Kim's  
20 counsel been prompted in front of the Court to check Kim's whereabouts at the hearing that  
21 morning. Experience has shown that Kim typically only responds to direct pressure from the  
22 Court, and as soon as the spotlight begins to fade, she returns to her old, passive-aggressive ways.  
23 Again, Robyn possesses numerous text messages which can be provided for review if need arises  
24 illustrating how difficult and untenable it is trying to communicate with Kim, and how her poor  
25 communication negatively impacts Ms. Jones.

1           41.     All of this has been communicated to the guardian repeatedly as the Court is  
2 probably aware because of the many hearings in this case. It is ridiculous that Petitioners are  
3 forced to file this lengthy and detailed petition simply to get to see their mother regularly.

4 **H. The Court Heard from Robyn and Donna at the September 17, 2017 Hearing Regarding**  
5 **the Devastation Kim’s Interference has Caused Petitioners.**

6           42.     As stated at the last hearing, when Robyn speaks with Ms. Jones by telephone,  
7 Ms. Jones communicates that she wants to see Robyn and her grandson and that she will call  
8 Robyn to set it up. Unfortunately, Ms. Jones does not remember to call. Then, more recently,  
9 while Robyn was discussing this with Ms. Jones, Robyn suggested they schedule a visit right  
10 during that conversation. Robyn then heard a voice in the background state, “hang up, hang up.”  
11 Ms. Jones then stated to Robyn, “I love you, gotta go,” and hung up. Unfortunately, such  
12 interference by the person in the background influencing Ms. Jones to end a telephone  
13 conversation and not plan an in-person visit smacks of the very behavior prohibited under NRS  
14 200.5092(4) that defines “isolation” of an older or vulnerable person as elder abuse.

15           43.     Another example of this, as stated on the record at the last hearing, is that Donna  
16 has not seen or spoken to Ms. Jones for a very long time. Donna has had the same type of issues  
17 as Robyn. Donna would not receive any notifications from Ms. Jones or Kim that Ms. Jones was  
18 in California. Additionally, her communications are not returned. The only time Donna speaks  
19 with Ms. Jones is when Ms. Jones is with Robyn and Robyn helps Ms. Jones call Donna. Kim is  
20 not facilitating Ms. Jones’ communication with Donna, a daughter who also loves Ms. Jones,  
21 and who Ms. Jones, upon information and belief, also loves. This is simply NOT an issue of Ms.  
22 Jones choosing to end her relationship with three-quarters of her family. Rather, this is Ms.  
23 Jones’ guardian choosing for personal reasons to pick and choose with whom she will help Ms.  
24 Jones have a relationship.

1 **I. Since the September 17, 2020 Hearing, Communication and Visits Have Been on Life**  
2 **Support.**

3 44. Petitioners waited to file this petition to see if the increased attorney-intervention  
4 would help Kim course-correct without a Court order. Unfortunately, events in the last three  
5 months solidified the need for Court ordered communications, visits, and vacation.

6 45. In one instance, Kim sent Robyn a last-minute text message offering to allow  
7 Robyn to see Ms. Jones that day – causing Robyn to lose thousands of dollars in business as she  
8 dropped everything to see her mother. At 11:32 a.m. on Saturday, October 10, 2020, Robyn  
9 received a last-minute text from Kim stating, “Mom is available this weekend if you’d like to  
10 see her, I’m happy to drop her off and pick her up.” Not only was the weekend half over, but  
11 unfortunately, Robyn runs an event company that operates on weekends – and Kim knows this.  
12 Accordingly, Robyn already had work events scheduled with at least six employees at work.  
13 Again, this has been discussed with Kim ad nauseum. Robyn replied, “Kim! We can’t just get  
14 a last minute text like this! Of course I want to see her. I’m working all weekend day and night.  
15 When else can we see her? I have Wednesday off. Can you bring her then? Anytime Wednesday  
16 between noon and 6 pm?”

17 46. Kim did not respond. Robyn sent a few more text messages even stating that if  
18 the weekend was the only time Ms. Jones was available that Robyn would “cancel the 6 people  
19 here working and the events at the venue and lose thousands of dollars, but it’s worth it.” Kim  
20 responded at 11:34 a.m., “Robyn enough already don’t be dramatic. If you want to see her I’m  
21 happy to bring her over and pick her up just let me know.”

22 47. Robyn responded that she had just made it known to Kim that she wanted to see  
23 Ms. Jones and asked if there were any days over the next two weeks for Ms. Jones to visit Robyn.  
24 She said if there were no other days, then Robyn would gladly lose thousands of dollars in work  
25 to see Ms. Jones. At 11:50 a.m., Kim’s only response to Robyn’s desperate pleas to solidify plans



1 was, "I'll contact you early in the week and see if we can't work out a day that will work for  
2 you." Robyn asked if they could schedule it now. Kim stopped responding even though Robyn  
3 continued sending Kim more texts pleading with Kim to schedule a visit right now or for Kim  
4 to allow Ms. Jones to see Robyn's family that weekend.

5 48. Kim did not respond again until 12:26 p.m. when she resorted to her "Just Call  
6 Mom" retort, "You can always call mom and ask her if she wants to go do something, she's quite  
7 capable of deciding how she wants to spend her social time." Robyn again pleaded with Kim,  
8 "Please just answer the question. Can I see her today or tomorrow as you offered? Or can we  
9 schedule a day over the next two weeks now?" Finally, around 12:31 p.m., Kim invited Robyn  
10 to schedule a time for her to drop Ms. Jones off at Robyn's home. Robyn sent her employees  
11 home to make herself available to visit with Ms. Jones that caused Robyn to incur a financial  
12 loss equaling thousands of dollars.

13 49. The issue is that Kim again stopped responding to Robyn's text messages. Robyn  
14 sent texts at 12:33 p.m. and 1:07 p.m. asking questions for when Ms. Jones was available for a  
15 visit – either that weekend or any day during the next two weeks. Finally, at 1:59 p.m., Kim  
16 acquiesced to Robyn's pleas stating that she would drop Ms. Jones off at Robyn's home at 5:00  
17 p.m. that day and pick Ms. Jones up at 7:00 p.m. Robyn immediately thanked Kim and asked  
18 Kim if Ms. Jones will need dinner. Kim did not respond. Again, at 3:05 p.m., Robyn renewed  
19 her questions about feeding Ms. Jones because she has "a four year old son that eats at 6 pm and  
20 goes to bed at 7 pm. I need to know if Mom will have already eaten dinner before she arrives, if  
21 she will be eating here, or if she's eating after . . ." Robyn also asked about whether there were  
22 any COVID-19 concerns or things Kim follows when Ms. Jones is out. Kim continued to not  
23 respond. At 4:04 p.m., Robyn informed Kim by text that her family was eating "now so we can  
24 spend time with her. Please make sure she isn't hungry when you drop her off."

25 50. Finally, at 4:09 p.m., Kim responded only with, "Normal COVID procedures 6

1 feet distance, she doesn't have a fever." Kim and Robyn continued sending a few texts back and  
2 forth about what Ms. Jones could do during the pandemic. At 4:55 p.m., Kim texted Robyn that  
3 Ms. Jones was at Robyn's home. In short, Kim's last-minute offer and failure to timely organize  
4 plans caused Robyn to lose money in her business and kept Robyn from figuring out if she  
5 needed to provided dinner for Ms. Jones.

6 51. In a second instance, Kim simply reverted back to the "just call mom" strategy.  
7 On October 13, 2020, Robyn asked Kim in a text:

8 When can I see Mom again? Any day of the week, except weekends over the next  
9 3 weeks works for me. Anytime between noon and 6 pm. Wednesdays are best. I  
10 just need to schedule ahead of time to get work organized so it's not all last minute  
11 arranged costing me a bunch of money like Saturday. Please let me know. She  
12 said she wants to see me. I can pick her up and drop her off. Although if she's  
13 like to stay at her house, we'd need to be there without you.

14 52. Kim responded that Robyn could "see mom whenever you want. Robyn, call and  
15 ask her." Kim also said that Ms. Jones just told her that she did not want to see Robyn because  
16 she recently saw her. Robyn responded," Ok, she said she went to CA and stayed with Scott last  
17 week and that she talked to Gerry [who is dead] on the phone – both things that didn't occur  
18 (dementia). So you incorrect (sic) when you purport that she can actually schedule anything."  
19 Robyn continued texting Kim to schedule another visit, but Kim stopped responding.

20 53. Around Halloween, Robyn tried the "just call mom" strategy to arrange a time  
21 for Ms. Jones to see her grandson in his Halloween costume as she has every year of his life.  
22 This time the "just call mom" strategy led to extreme confusion and required Kim's intervention  
23 to organize the visit. At 12:36 p.m. on October 30, 2020, Robyn sent Kim the following text  
24 message:

25 Please have Mom call me as soon as she can. Something doesn't sound right. She  
just said she doesn't want to see Amp in his costume this year. I'd like to talk to  
her more and ask why. Every single year of his life she's asked us to bring him  
over. I have all of the pictures. Do you know why she doesn't want to see him all  
of a sudden? I know she said she didn't feel well because her ankle hurt and she

1 just came back from the doctor, but that wouldn't keep her from seeing him while  
2 she lay in bed tomorrow it sounds odd."

3 54. At 12:12 p.m. on Halloween, Robyn asked if 3:00 p.m. was a good time to swing  
4 by for twenty minutes so Ms. Jones could see Amp's Halloween costume. At 2:28 pm., Robyn  
5 received no response from Kim and sent another text reminding Kim that Kim told Robyn the  
6 night before that they could come over at any time and that Robyn and her family were "running  
7 around busy and having fun with a 4 year old and we have plans to trick or treat at dusk and we  
8 live 35+ minutes from Mom." Finally, at 2:35 p.m., Kim responded that she would have Ms.  
9 Jones outside near a bench at 3:00 p.m. Robyn asked if Kim could make it 3:10 p.m. to account  
10 for the drive-time from Robyn's home to Ms. Jones' home.

11 55. During a meeting on December 3, 2020 that included Robyn and Petitioners'  
12 counsel, Robyn called Ms. Jones to schedule a visit. Ms. Jones struggled to understand the  
13 questions asked and could not provide answers to simple questions such as why Ms. Jones ate  
14 for Thanksgiving dinner. Robyn asked if they could get together sometime that week. Ms. Jones  
15 responded, "Well call me" – even though they were currently on the telephone. After Robyn  
16 continued to push to schedule a time, the phone call ended with Ms. Jones saying she would find  
17 out Kim's plans, and call Robyn back later that night with a plan for a visit. Later during the  
18 same meeting, Robyn called Ms. Jones again to follow up on planning a visit. Robyn asked Ms.  
19 Jones to commit to a day such as the upcoming Saturday for a visit, but Ms. Jones only responded  
20 that Ms. Jones would get back to Robyn because she was at a store. Ms. Jones never called  
21 Robyn back to schedule the visit until the weekend was nearly over to schedule a last-minute  
22 visit on Sunday morning. Kim knows that Donna and Robyn cannot manage last minute visits  
23 without incurring financial consequences due to their respective jobs, business, children, and  
24 other responsibilities. These visits with less than 24-hour notice are, essentially, knowingly  
25 isolating Ms. Jones in violation of the guardianship statutes.

1           56.     Petitioners have also struggled to schedule a time with Ms. Jones to give her  
2 Christmas presents. At 2:17 p.m. on December 14, 2020, Robyn text Kim asking if they could  
3 schedule time to spend with Ms. Jones before Christmas. Robyn told Kim, “I try to coordinate  
4 with mom but she says she’ll call me next week if we have to coordinate schedules and then she  
5 doesn’t.” Robyn offered a long list of availability for the visit including time frames on any  
6 Sundays, Saturdays, and weekdays in general, along with a discussion of how Robyn’s son,  
7 Amp, was excited when picking out his present to Ms. Jones. Kim did not respond until 8:18  
8 a.m. on December 16, 2020 with a short, “Sunday (20<sup>th</sup>) is good. I will take her to your house at  
9 1:00 and pick her up at 4:00.” Robyn responded that it was not possible for her to host the visit  
10 because the floors in her home are being refinished and requested that the visit take place at Ms.  
11 Jones’ home. Kim has not responded to the latest text message. In fact, Robyn received no phone  
12 calls from Ms. Jones or Kim on or about Christmas. Ms. Jones eventually called several days  
13 later to thank Robyn for gifts, but Ms. Jones did not remember that she did not call on the  
14 Christmas holidays.

15           57.     These incidents above are memorialized in numerous text messages which can be  
16 provided for review.

17           58.     Since September 10, 2020, the following, upon information and belief, is a  
18 breakdown on the telephone calls received by Robyn from Ms. Jones or Kim:

- 19           a.     Between 9/10/20 – 10/30/20, Robyn received no telephone calls from June.
- 20           b.     In September, Robyn received three incoming calls from Kim all on 9/18/20 for  
21               a total of five minutes.
- 22           c.     In October, Robyn received no telephone calls from Kim.
- 23           d.     In November, Robyn received no telephone calls from Kim.
- 24           e.     There have been no telephone calls between Robyn and Ms. Jones exceeding two  
25               minutes in duration.

1           59.     Recently, Kim began to facilitate more frequent communications between Ms.  
2 Jones and Donna. This has been a very recent development and likely traced back to the  
3 increased attorney involvement. However, Kim still refuses to coordinate frequent  
4 communication and visits between Ms. Jones and Robyn. Since Kim became guardian, Robyn  
5 has successfully visited Ms. Jones approximately five times even though Robyn lives in the same  
6 city as Ms. Jones. Kim refuses to provide sufficient effort to engage and have Ms. Jones visit  
7 with Robyn.

8           60.     Kim will defend her behavior to Robyn by saying that Kim has never told Robyn  
9 that she could not see Ms. Jones. But her behavior described above amounts to behavior falling  
10 just short of outright refusal that is demoralizing and exhausting. Kim is attempting to groom  
11 her sisters and the Court into understanding that she will not be told what to do.

12           61.     Without Court intervention now, Kim will not continue to facilitate  
13 communication and visits and yet more litigation will be required for Ms. Jones to have time  
14 with family members other than those whom Kim picks and chooses to help Ms. Jones  
15 communicate with and visit.

16           62.     Under NRS 159.332, a guardian shall not restrict the right of a protected person  
17 to communicate, visit or interact with a relative or person of natural affection. NRS 200.5092(4)  
18 defines “isolation” as preventing an older or vulnerable person from having contact with another  
19 person by intentionally preventing the older or vulnerable person from receiving visitors, mail  
20 or telephone calls. All the foregoing examples of actions and inactions on the part of Kim are  
21 violations of NRS 159.332 and NRS 200.5092(4).

22           63.     Sadly, Petitioners are concerned that given their mother’s forgetfulness and likely  
23 dementia her memory of them may be dimming due to a lack of visits resulting from Kim’s  
24 interference. Over the last year, the longest phone call Robyn has had with Ms. Jones was only  
25 two minutes. This is due to Kim’s interference. Additionally, Kim refuses to leave “her” home

1 during visits which forces Robyn to take Ms. Jones to places whether she wants to go or not and  
2 Ms. Jones gets confused about why she's being forced to leave her home. As per her attorney,  
3 Ms. Jones would rather have these visits in an easy setting when she is not feeling up to going  
4 out. This is important because Ms. Jones is not always physically capable of leaving her home  
5 and she is not cognitively capable of orienting herself properly for scheduling and meeting  
6 outside of her home.

7 64. Additionally, Petitioners fear that Robyn is being portrayed as the cause of the  
8 ongoing communication and visit dispute. Robyn believes that Ms. Jones views her differently  
9 because of this portrayal. This ongoing dispute is negatively affecting Ms. Jones' relationship  
10 with her daughters.

11 65. In reality, Kim's intervention is required to facilitate communication, visits, and  
12 vacation between Ms. Jones and the rest of her family. Even if Robyn coordinates a visit with  
13 Ms. Jones, Kim's involvement is still required to ensure there are no conflicts with Ms. Jones'  
14 other appointments. In short, there will be absolutely minimal communication and no visits  
15 between Ms. Jones and her family if the Court does not intervene.

16 **THIS COURT SHOULD ENTER AN ORDER FOR**  
17 **THE PARTIES TO USE TALKING PARENTS**

18 66. Despite a staggering number of meet and confer efforts to resolve this without  
19 the Court's intervention – including a large amount of attorney fees incurred in trying to get  
20 Kim, as guardian, to cooperate in a way that most people would consider humane and intuitive  
21 – Petitioners have been unable to persuade Kim to facilitate communication and visits in a clear,  
22 time-sensitive, and effective manner. The foregoing illustrates the dire need Ms. Jones and her  
23 family have for this Court to intervene and enter an order governing communication, visits and  
24 vacation time with Ms. Jones.

25 67. It is in Ms. Jones' best interest that this Court order Kim and the other parties in



1 this case to use Talking Parents. It is a cost-effective, efficient way for them to communicate  
2 regarding every aspect of this case, especially visits and vacation time. Ms. Jones needs this to  
3 ensure she has time with her children and grandchildren, not just Kim and those persons Kim  
4 prompts Ms. Jones to call or takes Ms. Jones to visit regularly. Again, Kim's improvement since  
5 September 17, 2020 in this is only because she knew this Petition was going to be filed and the  
6 Court and attorneys were getting more and more involved . . . again. Even so, Kim's current  
7 improvement resulted in only three very strained visits – one in a car opening Christmas presents  
8 for an hour, one for 10 minutes on Ms. Jones' outside bench on Halloween, and one last minute  
9 visit for 2-3 hours at Robyn's home that took all day to coordinate. An Order is needed to ensure  
10 she continues to help Ms. Jones with communication, visits and vacation time with all family  
11 members.

12         68. Talking Parents is also a good way for this Court to observe the communications  
13 and/or non-communications taking place to inform the Court when it comes time to make  
14 decisions in this case.

15         69. Despite repeated requests from Robyn during these proceedings, Kim refuses to  
16 use Our Family Wizard or Talking Parents which are programs designed to facilitate and verify  
17 communication and visits when families are struggling with these activities. Then, oddly, Kim  
18 requested to use one of these programs during the January 14, 2020 hearing in this case. *See Tr.*  
19 *Re: All Pending Motions Jan. 14, 2020, 12:14-18, 14:19-15:12 (filed Jan. 31, 2020).* This Court  
20 agreed it could be helpful. *See Tr. Re: All Pending Motions Jan. 14, 2020, 15:22-16:2 (filed Jan.*  
21 *31, 2020).* Unfortunately, Kim failed to setup either program (which all parties seem to agree  
22 would help) for the family and continues to refuse to do so.

23         70. Kim's attorney claims Petitioners are causing the expenditure of a lot of money.  
24 Petitioners agree that sadly costs are extremely high. But evidence shows the solution is easily  
25 within the control of the guardian. She has the legal right an obligation to ensure visits that June

1 wants are coordinated. Ms. Jones wants visitation with both Robyn and Donna and their families  
2 – Ms. Jones’ posterity.

3 **THIS COURT SHOULD ORDER AN INTERVIEW AND MEDIATION**  
4 **AT THE FAMILY MEDIATION CENTER (“FMC”)**

5 71. Like Talking Parents, the Family Medication Center (“FMC”) is another good  
6 tool for this Court to utilize to gain insight to make good decisions in this case.

7 72. It is in Ms. Jones’ best interest that this Court understand what she wants  
8 regarding communication, visits and vacation time with her children and grandchildren, and also  
9 her limitations in coordinating this area of her life.

10 73. It is also in Ms. Jones’ best interest for this Court to receive a report from a trained  
11 interviewer at FMC regarding Ms. Jones’ preferences and cognitive abilities to give informed  
12 consent. It is in Ms. Jones’ best interest that the interviewer asks open-ended questions that  
13 require more than a yes or no answer. This interview should be done outside the presence of the  
14 guardian or in the presence of all involved, perhaps sitting or standing away from Ms. Jones to  
15 afford her as much independence as possible in expressing her wishes.

16 74. It is also in Ms. Jones’ best interest that this Court order Kim, Robyn, Donna and  
17 any other interested party to participate in mediation at the Family Mediation Center to put  
18 together a communication, visit and vacation plan that incorporates the use of Talking Parents.  
19 The intricacies of such a plan could be discussed and decided upon given that Robyn lives here,  
20 closer to Kim and Ms. Jones, while Donna and other relatives live in California or other more  
21 distant locations. Provisions could be tailored accordingly, some for family living close, and  
22 some for family living more distantly such that if Ms. Jones were ever to relocate to reside in a  
23 different state, the agreed-upon plan could continue uninterrupted in that jurisdiction without  
24 further cost to Ms. Jones’ estate to relitigate.

25 75. Even though the Eighth Judicial District Court Website states that the Family

1 Mediation Center “mediates child-contested issues only,” counsel for Robyn and Donna learned  
2 from FMC during a phone call that they have and can mediate a guardianship case and they could  
3 interview Ms. Jones. All that is needed is a Court Order to access their services.

4 **THIS COURT SHOULD CANVASS THE PROTECTED PERSON**

5 76. This Court should use its expertise to canvass the protected person to gain insight  
6 into her preferences and limitations, and into whether or not it would be wise to terminate this  
7 guardianship in favor of power of attorney documents in the future, and correspondingly whether  
8 it is a sound proposition that things would get better for Ms. Jones if the guardianship were  
9 terminated, without the strength of the Court. Such a canvass would become part of the record  
10 in this case to guard against any misguided attempt to terminate guardianship and revert to a  
11 power of attorney situation in this state, or in California where Kim and Ms. Jones may relocate.  
12 Robyn and Donna request that the canvass take place in such a way that Ms. Jones is unassisted  
13 and uncoached by her guardian or anyone else. This way, the Court can understand Ms. Jones’  
14 limitations clearly and they can be documented. Petitioners also request the opportunity to  
15 present, in camera, a list of proposed questions for the Court to consider asking Ms. Jones during  
16 the canvass. Petitioners propose that the other parties do the same if they desire. Robyn’s and  
17 Donna’s proposed questions will be geared towards their mother’s specific family situation,  
18 financial situation, social issues, safety, self-care and legal situation.

19 **THIS COURT SHOULD HEAR ARGUMENT REGARDING A COMMUNICATION,**  
20 **VISITS AND VACATION CALENDAR; AND ENTER AN ORDER**

21 77. It is in Ms. Jones’ best interest that this Court intervene and enter an order  
22 governing Ms. Jones’ communication, visits and vacation time with both local and distant  
23 family. It is also in the family’s best interest so all that care to visit or communicate with Ms.  
24 Jones will get the opportunity.

25 78. To help provide a full understanding of the situation, Robyn and Donna request

1 that Kim, as guardian, and that Ms. Jones' court-appointed counsel, in her capacity, articulate  
2 their perspective on Ms. Jones' deficiencies so they can be properly addressed. All interested  
3 parties deserve to have insight and understanding into how the persons that impact and influence  
4 Ms. Jones the most perceive her capacity and limitations.

5 79. If an FMC Mediation is not successful, Robyn and Donna request the Court's  
6 time and effort in holding a hearing to discuss Ms. Jones' preferences, and each parties'  
7 availability with the express purpose of organizing and entering a communication, visits and  
8 vacation calendar that implements use the of Talking Parents and Ms. Jones' place of residence.

9 80. Petitioners are willing to go down any path as long as the isolating treatment of  
10 Ms. Jones ceases, and the family can have regular, consistent communication, visits, and  
11 vacation with Ms. Jones. This is a common practice for a guardian to be responsible for  
12 coordinating communication and visits with a protect person's family.

13 81. As part of Petitioners' request for an order including a calendar, schedule or  
14 procedures for communication, visits and vacation, Petitioners want to point out the following:

- 15 a. When Kim followed parts of the May Agreement for Robyn, it worked well to have  
16 allotted time to pick up Ms. Jones from her place of residence every Wednesday  
17 from 1 pm to 6 pm and every other Saturday from 12 pm to 6 pm. This also worked  
18 better for Donna because Robyn would help Ms. Jones call Donna while Robyn  
19 and Ms. Jones were together, something Kim never did.
- 20 b. Petitioners need due regard to be given to their time limitations from running a  
21 business and caring for their families, and the distances they must travel to see Ms.  
22 Jones when deciding on timeframes for visits and notices.

23 82. Ms. Jones is not cognitively capable of coordinating logistics of visits including  
24 planning and providing reasonable notices. Accordingly, Petitioners would like to see a mediated  
25 agreement or a Court Order that sets guidelines for reliable ways for family to communicate,  
visit and have vacation time with Ms. Jones so attorneys do not need to get involved every few  
months. Petitioners are open to anything that provides guidance and includes reliable ways for  
family near Ms. Jones and for family that lives out-of-state, based upon what is best for Ms.

1 Jones and that is workable for Kim, Petitioners, and other family members. Even requirements  
2 for communication or visits that is worded as simply as “once a month,” or “twice a week” that  
3 are easy to understand and enforceable would greatly improve the situation. Such a mediated  
4 agreement or order will protect Ms. Jones’ right under NRS 159.328 to receive telephone calls,  
5 have visitors, and protect against isolation as defined under NRS 200.5092(4).

6 83. Petitioners do request that any mediated agreement or Court order includes the  
7 following provisions:

- 8 a. Kim is responsible for facilitating the scheduled communications, visits, and  
vacations;
- 9 b. Kim is to drive Ms. Jones to the local family visits 50% of the time;
- 10 c. Kim is not to refuse to allow these visits to occur at Ms. Jones’ home and Kim must  
11 stop refusing to leave the home to allow visiting family members a chance to visit  
12 with Ms. Jones in her home where she feels safe, secure, and comfortable;
- 13 d. Kim is to aid Ms. Jones in making telephone calls to her family one to two times a  
14 week at set times so as not to be manipulated to times when the family members  
are unlikely or unable to answer – ideally these phone calls will be over FaceTime  
or Zoom to allow face-to-face communications;
- 15 e. That there be a standing call time to check-in with family once or twice a week or,  
16 alternatively, ten minutes set aside every week where Kim calls all of Ms. Jones’  
family, including the grandchildren, on Ms. Jones’ behalf;
- 17 f. Anytime Ms. Jones visits another state where her family resides, Kim provides  
18 advance notification to the family to reasonably coordinate a realistic and quality  
visit;
- 19 g. Kim is mandated to weekly provide updates to Petitioners regarding Ms. Jones’  
20 physical travel plans if leaving the state, and general updates regarding her life such  
as her health, needs, desires, experience, and lawsuits which these communications  
21 being as far in advance as possible;
- 22 h. Any communications between Kim and Petitioners will be confirmed in writing;
- 23 i. The Court directs Kim to provide straightforward answers to questions raised in  
24 text messages promptly; rather than only answering one out of a few questions or  
providing responses that do not relate to the questions asked.
- 25 j. The Court instructs Kim of her responsibility before making any major decisions

concerning Ms. Jones; and

- k. That the same schedule from the May Agreement be used except that the schedule be in a Court Order and cover all of Ms. Jones' family.

84. Petitioners assert that while none of us likes to be ordered around, this is not ordering Ms. Jones around, though upon information and belief, this is how it is being presented to Ms. Jones by multiple parties. The guardianship Bill of Rights guarantees protection for Ms. Jones and Petitioners want that protection. However, the Bill of Rights also recognizes that people who need guardians also do not always have the capacity to understand or appreciate the planning and judgment needed to facilitate the best decisions for them. That is why help is needed; because protected persons lack some level of capacity to appreciate some of these things. Kim and her attorney, and to some extent, the legal aid attorney, continue to argue as though any effort to schedule is an unconscionable imposition on Ms. Jones' freedom. That is simply wrong, and their arguments are hurting Ms. Jones. All Petitioners seek is reasonable, basic communication and cooperation to facilitate visits that Ms. Jones wants, but is unable to arrange on her own.

85. Petitioners should not be forced to spend thousands of dollars negotiating and putting together an enormous petition full of examples and burdening the court simply to get basic visitation and communication with their mother. This could be a perfect way for Kim to get a break from her caretaking duties.

**THIS COURT SHOULD AWARD PETITIONERS THEIR  
ATTORNEY'S FEES AND COSTS PURSUANT TO NRS 159.338.**

86. The amount of time and attorney fees that have been incurred to insure intuitive simple, good faith, humane communication in this matter is ridiculous and has been a topic of discussion at nearly every hearing in this matter, with multiple sides accusing Kim of isolating Ms. Jones and using communication and visits – or the lack thereof – to punish those with whom Kim disagrees.



1           87.    NRS 159.338(1)(b), with emphasis added, states that in a proceeding held  
2 pursuant to NRS 159.331 to 159.338, inclusive, if the court finds that:

3                   (b) A guardian is in contempt of court or has acted frivolously or in bad  
4 faith in prohibiting or **restricting communication, visitation or**  
5 **interaction between the relative or person of natural affection and the**  
6 **protected person, the court may:**

- 7                           (1) Award attorney's fees to the prevailing party; and  
8                           (2) Impose sanctions against the guardian.

9           88.    NRS 159.338(2) adds that:

10                   Any attorney's fees awarded pursuant to this section must not be paid by  
11 the protected person or the estate of the protected person.

12           89.    In this case, as demonstrated throughout this petition by specific examples, Kim  
13 has acted frivolously and/or in bad faith in prohibiting and restricting communication, visits, and  
14 interaction between Ms. Jones and her daughters Robyn and Donna.

15           90.    Applying NRS 159.338 to order Kim to pay Petitioner's attorney's fees is perhaps  
16 the best deterrent to future violations of NRS 159.332 and/or attempts at isolation as defined in  
17 NRS 200.5092(4). Petitioners believe that without some motivation from this Court, Kim will  
18 revert to her passive aggression antics at the first opportunity and communication and visits will  
19 cease.

20           91.    Therefore, pursuant to NRS 159.338, this Court should order Kim to pay  
21 Petitioners' attorney's fees and costs incurred in bringing this motion, the total amount to be  
22 subsequently decided upon by this Court after Petitioners file and serve their *Brunzell* affidavit  
23 and memorandum of fees and costs for review.

24                   **PRAYER FOR RELIEF**

25           WHEREFORE, based upon the foregoing, Petitioners request that the Court GRANT  
Petitioners Robyn and Donna's Petition in its entirety and ORDER:

1. That the parties use Talking Parents;

1       2. That Kim shall take Ms. Jones to FMC for an interview using open-ended questions,  
2 without any other person(s) present, if possible, to get more than just yes or no answers and  
3 really ascertain Ms. Jones' preferences concerning communication, visits and vacation with her  
4 family members, and her ability to use her phone;

5       3. That Kim, Robyn, Donna and any other interested party who wants to attend, shall attend  
6 a mediation at FMC to decide upon a communications, visits, and vacation calendar that  
7 incorporates use of Talking Parents and allows for visits and phone calls from persons living  
8 closer to Ms. Jones and out-of-state, as well as vacation time;

9       4. That the Court Canvass Ms. Jones to ascertain her preferences and limitations and  
10 capabilities including cognitive abilities;

11       5. That if an agreement is not reached through FMC, the Court hold a hearing to receive  
12 input from all parties and decide upon and order a communications, visits, and vacation calendar  
13 that incorporates the use of Talking Parents and allows for regular visit opportunities and phone  
14 calls from persons living closer to Ms. Jones and out-of-state, as well as vacation time;

15       6. That any Court order include the following provisions:

- 16           a. Kim is responsible for facilitating the scheduled communications, visits,  
            and vacations;
- 17           b. Kim is to drive Ms. Jones to the local family visits 50% of the time;
- 18           c. Kim is not to refuse to allow these visits to occur at Ms. Jones' home and  
19              Kim must stop refusing to leave the home to allow visiting family members  
20              a chance to visit with Ms. Jones in her home where she feels safe, secure,  
            and comfortable;
- 21           d. Kim is to aid Ms. Jones in making telephone calls to her family one to two  
22              times a week at set times so as not to be manipulated to times when the  
23              family members are unlikely or unable to answer – ideally these phone calls  
            will be over FaceTime or Zoom to allow face-to-face communications;
- 24           e. Anytime Ms. Jones visits another state where her family resides, Kim  
25              provides advance notification to the family to reasonably coordinate a  
            realistic and quality visit;


- 1 f. Kim is mandated to weekly provide updates to Petitioners regarding Ms.  
2 Jones' physical travel plans if leaving the state, and general updates  
3 regarding her life such as her health, needs, desires, experience, and lawsuits  
4 which these communications being as far in advance as possible;  
5  
6 g. The Court directs Kim to provide straightforward answers to questions  
7 raised in text messages promptly; rather than only answering one out of a  
8 few questions or providing responses that do not relate to the questions  
9 asked.  
10  
11 h. Any communications between Kim and Petitioners will be confirmed in  
12 writing;  
13  
14 i. The Court instruct Kim of her responsible before making any major  
15 decisions concerning Ms. Jones; and  
16  
17 j. That the same schedule from the May Agreement be used except that the  
18 schedule by in a Court Order and cover all of Ms. Jones' family.

19 7. That Kim pay Petitioners' attorney's fees and costs incurred in bringing this motion, with  
20 the total amount of the award to be subsequently decided upon by this Court after Petitioners file  
21 and serve their *Brunzell* affidavit and memorandum of fees and costs for review; and

22 8. Such other and further relief as the Court deems appropriate.

23 DATED: December 30, 2020.

24 MICHAELSON & ASSOCIATES, LTD.

25 

John Michaelson, Esq.

Nevada Bar No. 7822

Ammon E. Francom, Esq.

Nevada Bar No. 14196

2200 Paseo Verde Parkway, Ste. 160

Henderson, Nevada 89052

*Counsel for Petitioners*

**CERTIFICATE OF SERVICE**

Pursuant to NEFCR 9, the undersigned hereby certifies a copy of the foregoing Petition was electronically served on the following individual on December 30, 2020. In addition, pursuant to Nevada Rule of Civil Procedure 5(b), the undersigned hereby certifies that on December 31, 2020 a copy of the Petition was mailed by regular US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada, to the following individuals and/or entities at the following addresses:

Jeffrey R. Sylvester <a href="mailto:jeff@sylvesterpolednak.com">jeff@sylvesterpolednak.com</a>  Kelly L. Easton <a href="mailto:kellye@sylvesterpolednak.com">kellye@sylvesterpolednak.com</a>  Co-Counsel for Petitioners, Robyn Friedman and Donna Simmons	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada <a href="mailto:mparra@lacs.nv.gov">mparra@lacs.nv.gov</a> <i>Attorney for Kathleen June Jones</i>  Penny Walker <a href="mailto:walker@lacs.nv.gov">walker@lacs.nv.gov</a>  <i>Counsel for June Jones</i>
Geraldine Tomich, Esq. <a href="mailto:gtomich@maclaw.com">gtomich@maclaw.com</a>  James Beckstrom, Esq. <a href="mailto:jbeckstrom@maclaw.com">jbeckstrom@maclaw.com</a>  Cheryl Becnel <a href="mailto:cbecnel@maclaw.com">cbecnel@maclaw.com</a>  <i>Attorneys for Kimberly Jones</i>	Kate McCloskey <a href="mailto:NVGCO@nvcourts.nv.gov">NVGCO@nvcourts.nv.gov</a>  LaChasity Carroll <a href="mailto:lcarroll@nvcourts.nv.gov">lcarroll@nvcourts.nv.gov</a>  Sonja Jones <a href="mailto:sjones@nvcourts.nv.gov">sjones@nvcourts.nv.gov</a>

Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Teri Butler 586 N. Magdalena Street Dewey, AZ 86327
Jon Criss 804 Harkness Lane, Unit 3 Redondo Beach, CA 90278	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
	Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832

MICHAELSON & ASSOCIATES, LTD.

/s/ Amber Pinnecker  
Employee of Michaelson & Associates

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**VERIFICATION**

Robyn Friedman, being first duly sworn, under penalty of perjury, hereby deposes and says: that she is a Petitioner in the Petition above; that she has read the foregoing Petition and knows the contents thereof; that the same are true of her own knowledge except as to those matters therein stated upon information and belief and as to those matters, she believes them to be true; that she possesses text messages, telephone records, and videos as stated throughout this Petition that support, memorialize, and prove the facts as presented in this Petition.

\_\_\_\_\_  
ROBYN FRIEDMAN



**VERIFICATION**

Donna Simmons, being first duly, sworn under penalty of perjury, hereby deposes and says:  
that she is a Petitioner in the above-referenced Petition; that she has read the foregoing Petition  
and knows the contents thereof; that the same are true of her own knowledge except as to those  
matters therein stated upon information and belief and as to those matters, she believes them to be  
true.

---

DONNA SIMMONS



1 CNND

2  
3 **DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

4 In the Matter of the Guardianship of: G-19-052263-A  
5 Kathleen Jones, Protected Person(s) Department B

6  
7 **CLERK'S NOTICE OF NONCONFORMING DOCUMENT**

8 Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is  
9 hereby provided that the following electronically filed document does not conform to the  
10 applicable filing requirements:

11	Title of Nonconforming Document:	Verified Petition for
12		Communication, Visits, and
13	Party Submitting Document for Filing:	Vacation Time with Protected
14		Person
15	Date and Time Submitted for Electronic	
16	Filing:	12/30/2020 at 6:23 PM

17 Reason for Nonconformity Determination:

- 18 ☐ The document filed to commence an action is not a complaint, petition,  
19 application, or other document that initiates a civil action. *See* Rule 3 of the  
20 Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5,  
21 the submitted document is stricken from the record, this case has been closed and  
22 designated as filed in error, and any submitted filing fee has been returned to the  
23 filing party.
- 24 ☐ The document initiated a new civil action and a cover sheet was not submitted as  
25 required by NRS 3.275.
- 26 ☒ The document was not signed by the submitting party or counsel for said party.
- 27 ☐ The document filed was a court order that did not contain the signature of a  
28 judicial officer. In accordance with Administrative Order 19-5, the submitted  
order has been furnished to the department to which this case is assigned.

☐ Motion does not have a hearing designation per Rule 2.20(b). Motions must include designation “Hearing Requested” or “Hearing Not Requested” in the caption of the first page directly below the Case and Department Number.

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a nonconforming document may be cured by submitting a conforming document. All documents submitted for this purpose must use filing code “**Conforming Filing – CONFILE.**” Court filing fees will not be assessed for submitting the conforming document. Processing and convenience fees may still apply.

Dated this: 31st day of December, 2020

By: /s/ Elizabeth Odo  
Deputy District Court Clerk

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2020, I concurrently filed and served a copy of the foregoing Clerk’s Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court’s Electronic Filing and Service System.

By: /s/ Elizabeth Odo  
Deputy District Court Clerk



**SUPP**

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Fax: (702) 731-2337  
*Attorneys for Robyn Friedman  
and Donna Simmons*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )	Case Number: G-19-052263-A
OF THE PERSON AND ESTATE OF: )	Department: B
)	
Kathleen June Jones, )	
)	
An Adult Protected Person. )	
)	

**SUPPLEMENT TO VERIFIED PETITION FOR COMMUNICATION, VISITS,  
AND VACATION TIME WITH PROTECTED PERSON**

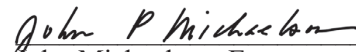
<input type="checkbox"/> TEMPORARY GUARDIANSHIP	<input checked="" type="checkbox"/> GENERAL GUARDIANSHIP
<input type="checkbox"/> Person	<input type="checkbox"/> Person
<input type="checkbox"/> Estate <input type="checkbox"/> Summary Admin.	<input type="checkbox"/> Estate <input type="checkbox"/> Summary Admin.
<input type="checkbox"/> Person and Estate	<input checked="" type="checkbox"/> Person and Estate
<input type="checkbox"/> SPECIAL GUARDIANSHIP	<input type="checkbox"/> NOTICES / SAFEGUARDS
<input type="checkbox"/> Person	<input type="checkbox"/> Blocked Account
<input type="checkbox"/> Estate <input type="checkbox"/> Summary Admin.	<input type="checkbox"/> Bond Posted
<input type="checkbox"/> Person and Estate	<input type="checkbox"/> Public Guardian Bond

COME NOW, pursuant to NRS 159.328(1)(d) and NRS 159.332, Robyn Friedman and Donna Simmons ("Petitioners" or "Robyn" and "Donna"), as family members and interested parties in this matter, by and through their attorneys at Michaelson & Associates, Ltd., and hereby supplements their Verified Petition for Communication, Visits, and Vacation Time with

1 Protected Person ("Petition") by attaching hereto the Verifications to the Petition executed by  
2 Petitioners.

3 DATED: December 31, 2020.

MICHAELSON & ASSOCIATES, LTD.

4  
5 

John Michaelson, Esq.

Nevada Bar No. 7822

6 Ammon E. Francom, Esq.

Nevada Bar No. 14196

7 2200 Paseo Verde Parkway, Ste. 160

8 Henderson, Nevada 89052

*Counsel for Petitioners*



**CERTIFICATE OF SERVICE**

Pursuant to NEFCR 9, the undersigned hereby certifies that on December 31, 2020 a copy of the Supplement to Verified Petition For Communication, Visits, and Vacation Time with the Protected Person was eserved to the following individuals and/or entities at the following addresses:

Jeffrey R. Sylvester <a href="mailto:jeff@sylvesterpolednak.com">jeff@sylvesterpolednak.com</a>  Kelly L. Easton <a href="mailto:kellye@sylvesterpolednak.com">kellye@sylvesterpolednak.com</a>  Co-Counsel for Petitioners, Robyn Friedman and Donna Simmons	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada <a href="mailto:mparra@lacs.org">mparra@lacs.org</a> <i>Attorney for Kathleen June Jones</i>  Penny Walker <a href="mailto:walker@lacs.org">walker@lacs.org</a>  <i>Counsel for June Jones</i>
Geraldine Tomich, Esq. <a href="mailto:gtomich@maclaw.com">gtomich@maclaw.com</a>  James Beckstrom. Esq. <a href="mailto:jbeckstrom@maclaw.com">jbeckstrom@maclaw.com</a>  Cheryl Becnel <a href="mailto:cbecnel@maclaw.com">cbecnel@maclaw.com</a>  <i>Attorneys for Kimberly Jones</i>	Kate McCloskey <a href="mailto:NVGCO@nvcourts.nv.gov">NVGCO@nvcourts.nv.gov</a>  LaChasity Carroll <a href="mailto:lcarr@nvcourts.nv.gov">lcarr@nvcourts.nv.gov</a>  Sonja Jones <a href="mailto:sjones@nvcourts.nv.gov">sjones@nvcourts.nv.gov</a>

In addition, pursuant to Nevada Rule of Civil Procedure 5(b), the undersigned hereby certifies that on January 4, 2021, a copy of the Supplement to Verified Petition For Communication, Visits, and Vacation Time with the Protected Person was mailed by regular US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada, to the following individuals and/or entities at the following addresses:

1 2	Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Teri Butler 586 N. Magdalena Street Dewey, AZ 86327
3 4	Jon Criss 804 Harkness Lane, Unit 3 Redondo Beach, CA 90278	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
5 6		Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832

MICHAELSON & ASSOCIATES, LTD.

/s/ Amber Pinnecker  
Employee of Michaelson & Associates

VERIFICATION

Donna Simmons, being first duly, sworn under penalty of perjury, hereby deposes and says:  
that she is a Petitioner in the above-referenced Petition; that she has read the foregoing Petition  
and knows the contents thereof; that the same are true of her own knowledge except as to those  
matters therein stated upon information and belief and as to those matters, she believes them to be  
true.

  
DONNA SIMMONS

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**VERIFICATION**

Robyn Friedman, being first duly sworn, under penalty of perjury, hereby deposes and says: that she is a Petitioner in the Petition above; that she has read the foregoing Petition and knows the contents thereof; that the same are true of her own knowledge except as to those matters therein stated upon information and belief and as to those matters, she believes them to be true; that she possesses text messages, telephone records, and videos as stated throughout this Petition that support, memorialize, and prove the facts as presented in this Petition.



---

ROBYN FRIEDMAN



DISTRICT COURT  
CLARK COUNTY, NEVADA

In the Matter of the Guardianship of: Case No.: G-19-052263-A  
Kathleen Jones, Protected Person(s) Department B

**NOTICE OF ACCOUNTING REVIEW**

**TO: Kimberly Jones**

The Eighth Judicial District Court Guardianship Compliance Division (GCD) has reviewed the accounting filed on 12/21/2020. The timeframe covered by the accounting is: 1/30/2020 to 11/23/2020. The GCD recommends discussion of the following items:

- ☐ The above referenced accounting has been reviewed by GCD and no issues were identified.
- ☒ There is time missing between the prior accounting ending date of 10/15/2019.
- ☐ The account is for multiple protected persons/minors and each protected person's interests in receipts, disbursements, and assets are not clearly shown.

**Account Summary**

- ☐ Is missing or incomplete;
- ☐ Is illegible;
- ☐ Contains mathematical error(s);
- ☒ Is not consistent with the information on the supporting worksheets; and
- ☒ Other Issues and Comments: The Ending Balance listed in the Recap does not equal the assets listed at the end of the accounting.

**Worksheet A: Assets & Debts**

- ☐ Is missing or incomplete;
- ☐ Is illegible;
- ☐ Contains mathematical error(s);
- ☒ The Starting Balance is inconsistent with past filings;
- ☒ The Ending Balance is inconsistent with the transactions; and

☐ Other Issues and Comments: The Starting Balance (\$0) does not match the various Inventories that have been filed.

The Assets At the End of the Accounting do not match the Recap.

**Worksheet B: Gross Income**

☐ Is missing or incomplete;

☐ Is illegible;

☐ Contains mathematical error(s);

☐ Contains gaps and missing entries for expected income (e.g., pensions, Social Security, rental income); and

☒ Other Issues and Comments: The Income is not itemized. In depth analysis is not available.

**Worksheet C: Expenses**

☐ Is missing or incomplete;

☐ Is illegible;

☐ Contains mathematical error(s);

☐ Is missing entries for expected expenses (e.g., health insurance, property insurance, room and board);

☒ Expenditures are not itemized; and

☒ Other Issues and Comments: The Expenses are not itemized. In depth analysis is not available.

**Other Issues and Comments:**

/s/ Riley Wilson

Guardianship Compliance Division



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**CERTIFICATE OF SERVICE**

I hereby certify that on the above file stamped date, a copy of the foregoing Notice was E-Served pursuant to NEFCR 9 or mailed to pro se litigants, via first class mail, postage fully prepaid to:

Geraldine Tomich  
Marquis Aurbach Coffing P.C.  
Attn: Geraldine Tomich, Esq  
10001 Park Run Dr.  
Las Vegas, NV 89145

Maria L. Parra-Sandoval  
725 E Charleston BLVD  
Las Vegas, NV 89104

/s/ Angela Root  
Guardianship Compliance Employee



1 **OPP**

2 Maria L. Parra-Sandoval, Esq.  
3 Nevada Bar No. 13736  
4 mparra@lacsns.org

5 **LEGAL AID CENTER OF**  
6 **SOUTHERN NEVADA, INC.**  
7 725 E. Charleston Blvd.  
8 Las Vegas, NV 89104  
9 Telephone: (702) 386-1526  
10 Facsimile: (702) 386-1526

11 *Attorney for Kathleen June Jones, Adult Protected Person*

12 **EIGHTH JUDICIAL DISTRICT COURT**  
13 **FAMILY DIVISION**  
14 **CLARK COUNTY, NEVADA**

15 In the matter of the Guardianship of the Person  
16 and Estate of:

17 KATHLEEN JUNE JONES,  
18 Adult Protected Person.

19 **Case No.: G-19-052263-A**  
20 **Dept. No.: B**

21 **KATHLEEN JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR**  
22 **COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON**

23 Kathleen June Jones ("June"), the protected person herein, by and through her counsel,  
24 Maria L. Parra-Sandoval, Esq., hereby files this Opposition to Robyn Friedman and Donna  
25 Simmons' Verified Petition for Communication, Visits, and Vacation Time with Protected  
26 Person (the "Opposition"). June's Opposition is based upon and supported by the Memorandum  
27 of Points and Authorities contained herein, the pleadings and papers on file in this case, and the  
28 argument of counsel as allowed by the Court at the time of hearing.

DATED this 25<sup>th</sup> day of January, 2021.

LEGAL AID CENTER OF SOUTHERN  
NEVADA, INC.

/s/ Maria L. Parra-Sandoval

Maria L. Parra-Sandoval, Esq.  
*Attorney for Kathleen June Jones,*  
*Adult Protected Person*

1                                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2                   **I.     Introduction**

3             June requests for this Court to honor her preferences with regards to communications,  
4 visits and vacation time with her adult children under both NRS 159.328(h) and (i). Under NRS  
5 159.328 (h), a protected person has the right to “Remain as independent as possible, including,  
6 without limitation, to have his or her preference honored regarding his or her residence and  
7 standard of living, either as expressed or demonstrated before a determination was made relating  
8 to capacity or as currently expressed, if the preference is reasonable under the circumstances.”  
9 Subsequently, under NRS 159.328 (i), a protected person has the right to “Be granted the greatest  
10 degree of freedom possible, consistent with the reasons for a guardianship, and *exercise control*  
11 *of all aspects of his or her life* that are not delegated to a guardian specifically by a court order.”  
12 (emphasis added). As has been stated multiple times before in these proceedings: The purpose  
13 of these rights is to give the protected person the driver’s seat in his or her guardianship case.  
14 The law is clear that it is June who gets to control aspects of her life such as communications  
15 and visitation with her adult children, including refusing to communicate with or visit with  
16 family members she does not want to see.

17             June is clear that she does not want the imposition of anything that looks like a visitation  
18 schedule nor does she want her guardian to be bound by a communication protocol to arrange  
19 calls or visitation when June is easily accessible. An additional communication tool will only  
20 isolate June from her own family. Like any other person not in a guardianship, June wants to be  
21 able to call or plan visits when she feels like it. June wants to be treated like “a normal person  
22 who can call [whoever she wishes] at any time.” In many ways, June is content with the status  
23 quo—without a court order subjecting her to Robyn Friedman and Donna Simmons’  
24 (“Petitioners”) demands for a schedule or for mandatory mediation for the purpose of  
25 determining a visitation schedule. Finally, June wants her family to listen to her wishes and  
26 desires and quit treating her as if she has no say in with whom or how she wants to communicate  
27 with members of her own family.  
28

1           **II.     Argument**

- 2           a. Petitioners' request seeks nothing more than to satisfy their own self-serving  
3           interests without the slightest regard for June's oft-repeated wishes.

4           Petitioners are requesting this Court to employ the *same* procedures used in minor  
5 custody actions or contested divorce actions involving children to impose a visitation schedule  
6 on June, as if she were a child with little to no rights to her own choices regarding with whom  
7 she does or does not wish to communicate. Petitioners seek a visitation schedule pursuant to  
8 those procedures, not because such a schedule would benefit June or because that is what June  
9 wants, but in spite of her wishes. Petitioners demand a visitation schedule solely because it  
10 would benefit them. NRS 159, and more specifically the Bill of Rights, does not provide support  
11 for the Petitioners' repeated demands. They should not be allowed to continue to manipulate  
12 time and resources of this Court simply for their own selfish purposes or because they do not get  
13 along with the guardian. June adamantly and consistently opposes such procedures, specifically  
14 the proposed interview and mediation at the Family Mediation Center.

15           The current petition once again demonstrates the unsisterly conduct between June's  
16 daughters. This Court's role is to protect June, the protected person, by ensuring the guardian  
17 abides by her obligations under NRS 159 and by allowing June, pursuant to the Bill of Rights,  
18 to have a voice in decisions that affect her. It is not the Court's role to appease the family  
19 members. June has made her wishes known to her attorney that she does not want additional  
20 procedures and a potential schedule imposed on her. Nor does she wish to attend mediation or  
21 be interrogated by anyone regarding visitation with family. June should not have to pay such a  
22 high price because of her daughters' never-ending tug-of-war communication battles. This is  
23 emotionally draining to June. Instead, it is the guardian and the Petitioners who should be sent  
24 to mandatory mediation to work out their communication problems, at no additional cost to  
25 June's estate. Unfortunately, the Court cannot fix decades of bad family relationships. June's  
26 daughters need to fix it themselves with the help of a mediator, retreat, etc. June is not the  
27 problem here and should not be treated as if she is.

1        There are challenges family members will undoubtedly face with protected persons with  
2 diminished capacity. The Nevada Statutes grant protected persons many freedoms to the extent  
3 that they are able to execute them—which includes scheduling their own communications and  
4 visitations and deciding who they want to visit or not. In this instance, June is perfectly capable  
5 of expressing, as well as managing, with whom and how she wishes to communicate. She has  
6 made those wishes known to counsel. Counsel has relayed June’s wishes to Petitioners’ counsel  
7 but neither he nor his clients will accept those wishes and have now sought court intervention.

8            b. June’s wishes have been adequately expressed through her counsel

9        Petitioners argue that June “is cognitively incapable of reliably and accurately  
10 transferring visit information to anyone or remembering to act on it herself.”<sup>1</sup> Petitioners have  
11 failed to present any evidence to support this rather bold and definitive statement. While June  
12 may have been determined to lack capacity such that a guardianship has been ordered, that fact  
13 does not equate with a “cognitive[] incapabil[ity]” to express her wishes with regard to who and  
14 how she wants to communicate or visit. In fact, NRS 159.331, et.seq. anticipates that any  
15 protected person under a guardianship order retains the right to self-determine on the issue of  
16 visitation and communication, throughout the guardianship. As long as June is able to direct her  
17 court-appointed attorney, this Court should continue to honor what June wants because that it  
18 what NRS 159 mandates.

19        Petitioners further argue that it may be time for this Court to appoint a guardian ad litem  
20 to act on June’s best interests presumably because a guardian ad litem would determine that  
21 forcing a visitation schedule on June that she adamantly opposes is in her best interest.<sup>2</sup> Thus  
22 far, Petitioners and their counsel have failed in their repeated and bullying efforts to force June,  
23 through her counsel, into the visitation protocol that they want.<sup>3</sup> Their strategy now is to have  
24 this Court appoint a guardian ad litem who they believe will simply agree that June should adhere  
25 to their visitation protocol, despite any of June’s protestations to the contrary, because what they  
26

27 \_\_\_\_\_  
28 <sup>1</sup> See Verified Petition, p. 5, paragraph 17.

<sup>2</sup> Id., p. 5, paragraph 17.

<sup>3</sup> See emails from John Michaelson, Petitioner’s counsel, attached as Exhibit A.

1 want is in June's best interest. Under the Bill of Rights, June has the right to determine with  
2 whom and how she wishes to communicate or visit and she has clearly expressed those wishes  
3 to counsel. There is no need for a guardian ad litem and this Court should dismiss the notion out  
4 of hand.

5 Further, Petitioners disingenuously argue that June's right to have an attorney represent  
6 her wishes in the guardianship is "failing" her because "it is not at all clear that [June] is able to  
7 direct the currently pending appeal ..."<sup>4</sup> First, the logic in this statement is just flat out  
8 impossible to follow. Second, how exactly is June's right to an attorney failing her? June's  
9 attorney has advocated for June's wishes at every stage of this unnecessarily tortured case,  
10 including her wishes with regard to her late husband's visitation demands, and his failed attempt  
11 to remove her preferred guardian. As the statute requires, the Court has provided June the  
12 opportunity to voice her wishes through appointed counsel and has taken June's wishes into  
13 consideration. As noted above, June still retains the right to be involved in decisions affecting  
14 her life **while in a guardianship** and her counsel has protected that right throughout the  
15 proceedings, including in the pending appeal. June is not ignorant of her legal issues. Her  
16 counsel has kept her apprised and involved in every matter heard and pending in her guardianship  
17 case. Counsel's role and responsibility is to June and she is not obligated to smooth things out  
18 between unreasonably contentious family members, as Petitioners appear to suggest by their  
19 demands.<sup>5</sup>

20 Presumably Petitioners and their counsel do not appreciate having to defend against  
21 June's appeal of this Court's decision to award their counsel's extremely high fees from her  
22 dwindling estate. They likely also do not appreciate that June's counsel continues to insist that  
23 June's wishes be considered in every aspect of the guardianship matter when what June wishes  
24 does not jive with or is contrary to their wishes. Too bad; it is June's right to appeal just as it is  
25 her right to determine with whom and how she wishes to communicate or visit. Petitioners'  
26 dissatisfaction and frustration with not having their repeated demands met does not mean that  
27

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28 <sup>4</sup> See Verified Petition, p. 5-p.6, paragraph 17.

<sup>5</sup> See id., paragraph 19.

1 Nevada's mandate, that all persons in guardianship must have counsel, is failing June. On the  
2 contrary, by all accounts, advocacy in guardianship, as mandated by NRS 159, is working quite  
3 well for June.

4 June is able to tell her guardian, as well as her attorney, who she wants to talk to and  
5 when. According to June, "Kimberly is doing a good job." The only issue here is that grown  
6 women refuse to work together with what should be simple logistics for setting up  
7 communication when June wishes to see a family member. Petitioners are seeking ways to  
8 simplify their lives by imposing additional procedures and a schedule on June and in doing so  
9 they are not honoring June's preferences. June's counsel will not assist them in that regard  
10 because it is not her role *nor is it June's wish*.

11 While not germane to the ultimate request, Petitioners have nonetheless raised the issue  
12 of the pending appeal in their request and June is compelled to respond. There is an additional  
13 adversarial component to June and Petitioners' relationship. June has appealed this Court's  
14 decision to pay Petitioners' attorney's fees from her estate. When provided with this current  
15 request of Petitioner's, June's response was "Robyn needs to stay out of my business and pay  
16 for her own damn fees." This is not an unreasonable statement. On September 25, 2020,  
17 Petitioner, Robyn Friedman, commenced an action in California as a Judgment Creditor to place  
18 a lien on June's home for a total of \$58,304.21,<sup>6</sup> the amount June must pay of Petitioners'  
19 attorneys' fees. This action on Robyn's part caused June further anguish. Now, the same  
20 Petitioner wants to enforce a visitation protocol on June that suits her needs rather than June's.  
21 Is it any wonder that June is not racing to the phone to communicate with or set up visits with  
22 either of the Petitioners under these circumstances? Forcing June to communicate or visit with  
23 Petitioners when there is so much tension caused by their continued litigation is not likely in  
24 June's best interest. More importantly, it is not what June wants. She feels she is being harassed  
25 by her own daughter "who always wants to have her way." It is reasonable for June to want to  
26 limit contact with family members who are active parties to a lawsuit, and who are so insistent  
27

28 <sup>6</sup> See Application for Entry of Judgment on Sister-State Judgment filed on September 25, 2020,  
Superior Court of California, County of Orange, attached as Exhibit B.



1 that June pay their attorney's fees that they have placed a lien on her home! June's reasonable  
2 and articulately expressed desires regarding communication with family members should be  
3 honored.

4 c. Family Mediation is unnecessary and a waste of time and resources.

5 Counsel has explored the use of applications like Family Wizard and Talking Parents  
6 with June, at Petitioners' repeated insistence, but June has consistently turned them down.  
7 Currently, with the ongoing litigation involving Petitioners, June is adamant that her preference  
8 is still "no." This Court should deny Petitioners' request for Mediation June is not a minor or the  
9 subject of a custody action; she is an adult whose dysfunctional family caused her to be in a  
10 guardianship despite the existence of a Power of Attorney and have continued to disregard her  
11 wishes since. June is verbal and can communicate well with her guardian and her attorney. She  
12 has the right and ability to make her preferences known to her attorney and the Court with regard  
13 to whom and how she wants to communicate or visit. Further, June objects to being subjected to  
14 interrogation by Petitioners, or anyone else for that matter, because she has counsel who can  
15 speak for her. June is not on trial here to be cross-examined. Petitioners have emotionally and  
16 financially drained their own mother already. This latest request is just more of the same  
17 unreasonable requests that Petitioners have made throughout the guardianship. June is willing to  
18 state her preference to this Court regarding her right to call, talk and visit with whomever she  
19 wants, or not, without the need for a schedule or for mandatory mediation, but that is all. Further  
20 statements will be made through court appointed counsel.

21  
22 **III. Conclusion**

23 For the above-stated reasons, June requests that this Court deny Petitioners' Verified  
24 Petition For Communication, Visits, And Vacation Time With Protected Person in its entirety.

25 ///

26 ///

27 ///

1 DATED this 25<sup>th</sup> day of January 2021.

2  
3 **LEGAL AID CENTER OF  
SOUTHERN NEVADA, INC.**

4 /s/ Maria L. Parra-Sandoval, Esq.

5 Maria L. Parra-Sandoval, Esq.

6 Nevada Bar No. 13736

7 **LEGAL AID CENTER OF  
SOUTHERN NEVADA, INC.**

8 725 E. Charleston Blvd

9 Las Vegas, NV 89104

10 Telephone: (702) 386-1526

11 Facsimile: (702) 386-1526

12 [mparra@lacs.org](mailto:mparra@lacs.org)

13 *Attorney for Adult Protected Person Kathleen  
June Jones*

14 **CERTIFICATE OF SERVICE**

15 I HEREBY CERTIFY that on the 25<sup>th</sup> day of January 2021, I deposited in the United  
16 States Mail at Las Vegas, Nevada, a copy of the foregoing document entitled **KATHLEEN  
17 JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION,  
18 VISITS, AND VACATION TIME WITH PROTECTED PERSON** in a sealed envelope,  
19 mailed regular U.S. mail, upon which first class postage was fully prepaid, addressed to the  
20 following:

21 N/A

22 AND I FURTHER CERTIFY that on the same date I electronically served the same document  
23 to the following via ODYSSEY, the Court's electronic filing system, pursuant to EDCR 8.05:

24  
25 James Beckstrom, Esq.

26 [jbecstrom@maclaw.com](mailto:jbecstrom@maclaw.com)

27 Geraldine Tomich, Esq.

28 [Gtomich@maclaw.com](mailto:Gtomich@maclaw.com)

Attorneys for Guardian

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John Michaelson, Esq.  
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Kate McCloskey  
[NVGCO@nvcourts.nv.gov](mailto:NVGCO@nvcourts.nv.gov)  
Guardianship Compliance Office

/s/Penny Walker  
Employee of Legal Aid Center of Southern Nevada

# EXHIBIT A

## Maria Parra-Sandoval

---

**From:** Maria Parra-Sandoval  
**Sent:** Thursday, August 06, 2020 5:09 PM  
**To:** 'John Michaelson'  
**Cc:** Patrick McDonnell; James A. Beckstrom  
**Subject:** RE: Kathleen June Jones

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**AmicusId:** 627495  
**AmicusStatus:** Saved  
**AmicusFileName:** Jones, Kathleen J. re: Adults Under Guardianship  
**AmicusFileIds:** 79094  
**AmicusDealtWith:** Yes  
**AmicusTimeEntry:** Yes

John,

What you are implicitly asking me to do is to force June, literally *force* her to agree to a schedule that she doesn't want. My job is to represent her wishes and that's what I have done the entire time since I was appointed to represent her. We have had many conversations over this same issue and her position has not changed. June has been the one client I've had the most contact with from all my past and present guardianship clients. June wants to see all her children, but on her own terms. I'm not going to force her to change her mind. Doing the opposite would be 'hurting' her. The fact that June is aligned with her guardian is out of my control. My job is not to defend Kimberly—she has her own attorney.

You have been practicing guardianship law long enough to know that we treat protected persons with diminished capacity as normal as possible (See the Bill of Rights). If you haven't filed anything thus far regarding forcing a visitation schedule on June is because you know your client will not be successful.

June has some memory issues but Robyn knows June is capable of deciding whether to go on an outing or not. Kimberly assists with putting the events on her calendar. As I've stated before, Kimberly is obligated to schedule medical appointments. But under the Bill of Rights, June should be treated as normal as possible and if she wants to manage her own social calendar, then she should be able to control her own social/visitation calendar.

Please disregard any typos.

Maria



Maria Parra-Sandoval, Esq.  
Attorney, Consumer Rights Project  
Legal Aid Center of Southern Nevada, Inc.  
725 E. Charleston Blvd.  
Las Vegas, NV 89104  
702-386-1526 direct/fax

702-386-1070 ext. 1526

[mparra@lacsnsn.org](mailto:mparra@lacsnsn.org)

[www.lacsnsn.org](http://www.lacsnsn.org)

Legal Aid Center of Southern Nevada, Inc. is a 501 (c) (3) organization and your [contribution](#) may qualify as a federally recognized tax deduction.



[Legal Aid Center E-Newsletter](#)

*Please remember Legal Aid Center of Southern Nevada in your estate plan.*

---

**From:** John Michaelson [mailto:[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)]  
**Sent:** Wednesday, August 05, 2020 6:57 PM  
**To:** Maria Parra-Sandoval <[MParra@lacsnsn.org](mailto:MParra@lacsnsn.org)>  
**Cc:** Patrick McDonnell <[patrick@Michaelsonlaw.com](mailto:patrick@Michaelsonlaw.com)>; James A. Beckstrom <[jbeckstrom@maclaw.com](mailto:jbeckstrom@maclaw.com)>  
**Subject:** RE: Kathleen June Jones

Maria, please try to be more reasoned in your approach to this case. As we keep telling you, June has been consistent in telling Robyn and Donna that she would like to see them and her grandson. Your ardent desire to support James in this case is hurting your client. We do not want to spend money on this matter and keep trying to respectfully raise issues with you and James but you are blind to any adjustments to the problem in this case – Kimberly. Extremely simple and humane responses from her – the kind I think you and I and James would naturally make for each other to help confirm and support visitation – do not happen. We keep telling you that.

I'm curious, how does June handle her medical appointments and court dates?

John P. Michaelson, Esq. | MICHAELSON & ASSOCIATES, LTD. | [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com) | 702.731.2333

---

**From:** Maria Parra-Sandoval <[MParra@lacsnsn.org](mailto:MParra@lacsnsn.org)>  
**Sent:** Wednesday, August 5, 2020 5:33 PM  
**To:** John Michaelson <[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)>  
**Cc:** Patrick McDonnell <[patrick@Michaelsonlaw.com](mailto:patrick@Michaelsonlaw.com)>; James A. Beckstrom <[jbeckstrom@maclaw.com](mailto:jbeckstrom@maclaw.com)>  
**Subject:** RE: Kathleen June Jones

John,

As I stated in my June 11, 2020 email, June has been consistently clear about her desire to control her visits. James keeps reiterating the same thing in this email chain.

If this is not an acceptable response to Robyn, please raise this issue with the court to put this to rest. It's taking even more time (and expense) outside the courtroom. As I have stated, June has been willing to tell the Judge herself what she wants. Your client needs to put June's wishes first—not her own. June is easily accessible and she's able to return my calls within a couple of hours. James has outlined what your client needs to do to communicate proposed vacation dates, etc. This shouldn't be a hard procedure to follow.

I spoke with June yesterday and she confirmed that she didn't want to go to Palm Springs and feels she is being harassed to go on vacation with Robyn. June doesn't want to be told what to do and doesn't want any kind of visitation schedule with Robyn. Also, if June is invited on a vacation, she only wants to go for two or three days at the most. Please let June control her own social schedule.

Maria Parra-Sandoval



Maria Parra-Sandoval, Esq.  
Attorney, Consumer Rights Project  
Legal Aid Center of Southern Nevada, Inc.  
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[Legal Aid Center E-Newsletter](#)

*Please remember Legal Aid Center of Southern Nevada in your estate plan.*

---

**From:** James A. Beckstrom [<mailto:jbeckstrom@maclaw.com>]  
**Sent:** Tuesday, August 04, 2020 3:53 PM  
**To:** 'John Michaelson' <[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)>; Maria Parra-Sandoval <[MParra@lacsnsn.org](mailto:MParra@lacsnsn.org)>  
**Cc:** Patrick McDonnell <[patrick@Michaelsonlaw.com](mailto:patrick@Michaelsonlaw.com)>  
**Subject:** RE: Kathleen June Jones

John,  
Every week I receive a multi-page letter from your office. It is getting absurd, as the complaints are all about what your client wants, as if they are the center of attention. The problem is, your client has ignored June's desires and attempts to treat this case like a child custody battle. It is not a child custody battle. It is not a case with a dictated "visitation schedule." June has her own attorney and has made this very clear. She doesn't want a set schedule with your client. If you ask the Court to impose one, it will be met with harsh opposition. Your client is becoming overbearing. The point of this is to once again relay that it is not Kimberly making all of these decisions, it is June—who has a strong opinion on these issues.

June has seen all of her children consistently for the past several months. She has also been balancing a juggling act with her husband—who has feigned imminent death over the past two weeks.

I will respond to each of your concerns below. But again, Kimberly has no problem with June leaving at anytime with Robyn. However, June has made it clear she is the person who decides when and where she goes. **My responses are in red below.**





**James A. Beckstrom, Esq.**

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Las Vegas, NV 89145

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---

**From:** John Michaelson <[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)>

**Sent:** Saturday, August 1, 2020 11:40 AM

**To:** James A. Beckstrom <[jbeckstrom@maclaw.com](mailto:jbeckstrom@maclaw.com)>; Maria Parra-Sandoval <[MParra@lacs.org](mailto:MParra@lacs.org)>

**Cc:** Patrick McDonnell <[patrick@Michaelsonlaw.com](mailto:patrick@Michaelsonlaw.com)>

**Subject:** [External] Kathleen June Jones

James,

As you are aware, our clients have longstanding unresolved complaints about your client and guardian Kim pertaining to communication and visitation with June Jones, their mother. Robyn has attempted to resolve the following disputes directly with Kim, to no avail, and our law firm has communicated with you at length about these things.

Pursuant to your discussions with our firm a couple of months ago as to how impasses between our clients should be handled and also to ensure our compliance with EDCR 5.501, we are once again bringing the most recent issues to your attention in a continuing attempt to resolve these disputes without court intervention. As you recall, you and I discussed that we would work together to resolve these things before they got out of hand.

Kim has made it untenable for Robyn, Perry and their son to visit her mother at her mother's own house. Robyn and Perry's son is 4 year old Ampersand.

The Friedman's have been trying to ensure that the visits to/with June are as beneficial to June as possible making sure the extended familial connections are protected for June to enjoy. As you are aware, part of the May 19, 2020 agreement, was that on every Wednesday from 1 p.m. to 6 p.m. and every other Saturday from noon to 6 p.m., Robyn was free to pick June up from June's home on Kraft Avenue or Robyn and any other family members could come to June's home to visit with June. Robyn and Perry have tried their best for months to make their visits to/with June work on Wednesday afternoons and every other Saturday. June has consistently approved of the Friedman's' visits and said she wants them to continue. Kim knows this; June has said so in front of Kim.

When the Friedman's visit June at her home, however, Kim always remains at the house, hovering, interrupting the visit, keeping the atmosphere tense, and essentially turning it into an uncomfortable supervised visit.

On July 22, 2020, Robyn and Perry, along with their 4-year-old son Amp, were visiting with June at June's home when Kimberly lost her temper, aggressively got up in June's face to repeatedly demand that June answer whether or not she wanted to go to Palm Springs for a week with Robyn (June said she did). When Robyn pleaded with Kim to stop, Kim proceeded to turn her anger on Robyn. Kim's eruption and hostility had June shrinking back into the couch and also thoroughly upset and confused Amp. The result of this instability is that absent changes, the Friedman's cannot continue to visit June at her home and cannot risk subjecting Amp to more outbursts of this type by Kim.

Granted, Robyn could and will continue to pick up June and take her away from June's house for visits. Leaving June's house and going somewhere else is not always possible or practical, however. Moreover, June should not have to always leave her own home to spend quality time with her extended family. . With COVID-19 on the resurgence, June at exceptionally high-risk, there are only a few places outside the home to which they can go and still keep June safe and abide by Kim's instructions in this regard, They have already visited most of those sight-seeing spots as June cannot enter public places safely use public restrooms which she needs approximately every two hours. They've also simply driven around town with June for hours talking and sightseeing - but driving around for hours in a car together does not really make for a good visit for a grandmother and a 4-year-old. June deserves better. If Kimberly could assist June in determining things she'd like to do or places she'd like to drive to during visits it would be very helpful to further June's enjoyment of this time as June's cognitive disabilities preclude her from often times being able to make suggestions when asked what she'd prefer to do. Leaving all planning up to the very last minute of arrival at the home for pick up severely limits options based on the Friedman's ability to arrange their own busy schedules at the last minute multiple times a week. To avoid or at least lessen the dysfunction and hostility at June's home so that June can continue to have visits there from her daughter and grandson, can't Kim just allow the Friedman's to have unsupervised visits at June's home? As Judge Marquis previously stated during a hearing in this case, most caretakers usually need and welcome a break. It would give Kim time to herself, to run errands, shop, or whatever she may want or need to do.

In any event, please inform us as to your client's proposed changes as to visitation so that June can continue to see the Friedman's absent the unhealthy environment both inside June's home and during pick-ups and drop-offs. We are asking that Kim tell us what is workable. The ball is in your client's court, as she is June's guardian, to find a workable solution to keep June connected to people with whom she repeatedly expresses interest in spending time. Without solutions, Kim will otherwise be alienating and isolating June away from visits from her daughter and grandson. For June and Amp's sake, Robyn and Perry will not risk this kind of blow-up again. The current situation is harmful to June in that it pushes people away from her when she wants to stay connected to her family. This is a tactic Kim has been seen to employ with others June has relationships with as well.

First, do not try to mischaracterize my email on May 19, 2020. The agreement was that June is available during those periods as she desires. I have It is not a visitation schedule, it was an attempt to further appease your client—who is making unreasonable demands and demands to be the center of attention in this case. I don't understand why Robyn can't take June to her house and drop her off.

Kim scuttled June and the Friedman's vacation by going to Arizona with June just days before the vacation was to begin and staying in Arizona two days past the vacation start date.

While June may travel when and where she likes, the utter lack of communication regarding how that trip would impact the vacation planned and agreed upon by Kim since last May was abysmal and in consistent fashion, last minute.

Despite agreeing on May 19, 2020, that the Friedman's could take June on vacation for the last week of July, and despite the vacation having been a subject that Robyn discussed with Kim for weeks, immediately after aggressively demanding that June say whether she wanted to go on vacation to Palm Springs with the Friedman's, without warning to the Friedman's, Kim either took June to Arizona or sent June to Arizona. Robyn only learned June was in Arizona on the night of Friday, July 24, 2020, when June informed Robyn during a phone call. The Friedman's had planned to leave for Palm Springs with June on the morning of Monday, July 27. It was not until the afternoon of Sunday, July 26, that Kim informed Robyn that June would not be back in Las Vegas until the night of Wednesday, July 29.

Kim has done this same kind of thing before, having previously taken June to Arizona and preventing June from participating in a long-planned visit that Donna had confirmed with Kim repeatedly before coming to Las

Vegas. Donna and her family arrived in Las Vegas only to find that Kim had taken mom to Arizona despite knowing about and agreeing previously with Donna's plans. So there is a pattern.

In Robyn's case, however, Kim violated her May 19, 2020 agreement as to Robyn's vacation with June in the last week of July – the very first time the vacation time was supposed to happen.

This is incorrect. June made her wishes very clear to Robyn. They communicated and apparently June expressed she didn't want to go to Utah for a vacation, but wanted to go to Palm Springs. Robyn never provided a specific date and time in which this trip was to occur. On 7/24 June called Robyn at 6:21 to tell her that she was going to Arizona and wouldn't be home to see Robyn for their usual Saturday visit. Thereafter, Robyn contacted Kim and told her that she was taking June on vacation from 7/27 to 8/2. This was done with 3 days' notice, which is a problem when they were in a neighboring state visiting June's other daughter. What ruined the plans after that, was the fact that Mr. Yeoman's attorneys called June's attorney informing her that Mr. Yeoman had "one day to live." This prompted rushed cries for bringing June back. Ultimately, It was confirmed that despite Mr. Yeoman claiming an imminent death—he is not on the verge of dying. Notwithstanding, June's desire was to see him, which she did. Again, she made the decision on who she wants to see.

I can't offer any more on this. June is able to decide on what she wants to do. She has independent counsel, she has a guardian who is caring for her, she is not isolated. The purpose of guardianship is accomplished. Guardianship doesn't offer your clients the ability to benefit themselves—it is not about your clients. If your client wants to put June through the stress of a hearing on these issues, they will be very disappointed. June is very stern on these issues. If your client has a specific date for a vacation, those need to be (1) discussed with June; and (2) set in stone with Kimberly. Kimberly has no issue with this. If you have proposed dates for vacations which June wants to attend, send them to me and they will be calendared. I will also note that June communicates extensively via facetime and phone calls with her children. Simply because a different relationship or line of communication may exist between one child vs another, is not a violation of any guardianship rule—it is simply a family dynamic.

As you are aware from our prior discussions, this is at least the second provision of Kim's May 19 agreement that she has violated, with the first being her commitment to call Robyn each Tuesday and Friday at 6 p.m. Kim has never complied with that provision of her agreement.

This too is incorrect. June freely communicates with her children. She talks to Robyn. June refuses to have a set schedule to "call" her daughter. If Robyn wants to talk to her mom, she can communicate with her and call her. Robyn knows well that June is fully able to communicate socially. June is not a child and she refuses to be treated like one. Maybe Maria can chime in on this. June pushed back when Kimberly attempts to set a schedule for her.

Given that months of discussion have not solved the communication and visitation disputes, and given these recent developments outlined above, we believe we need a court order to enforce the May 19 agreement and to also get a communication/visitation/vacation framework in place for Kim's pending removal of June from Nevada to California.

The Court won't have jurisdiction. There has not been a petition to move June and there are no plans to move June. This is getting absurd. A visitation framework wouldn't be needed even if she was moved, your client has the resources to see her mom anytime she wants. Just like any family relationship, if June wants to see her kids, they are free to see her.

- Is your client willing to consider stipulating to her May 19 terms?

The terms remain as is. June is fully capable of discussing her social life. She is fully capable of deciding what she wants to do. Consistent with the entire purpose of guardianship, June is provided the utmost freedom in making these de minimis life decisions. This includes things like vacations, hanging out, and shopping. Kimberly encourages and is always happy when June leaves to visit her other children. However, it is not Kimberly who is pushing back on arranging June's schedule—it is June. She is a tough person and insists that her children talk to her and plan time with her. Kimberly is not going to stomp on June's wishes. Your client is making this case all about her in focusing on visitation—this case is about June and how to protect her. June takes calls and is happy to talk to her children—she doesn't want to be on a schedule for calls. June is not prisoner. Kimberly remains happy to have straight forward communication with Robyn, with identified pick up dates and times. However, she is not Robyn's chauffeur.

- Is she willing to stipulate to the use of either Family Wizard or Talking Parents to improve communication and calendaring of visitations and vacation?

It will not assist anything. Based on the above, June has stated time and time again she is the keeper of her social schedule. Kimberly is a mere driver and confidant who assists June in making appointments and when she can social visits. Imposing additional work on Kimberly, who is already not being compensated, will not help anything. Again, the Court's only focus is whether June is being cared for and socialized—she is. No calendaring app is necessary.

- Is she willing to stipulate to a communication/visitation/vacation framework that would apply if/when she moves June to California? We understand that situations can change, but in this case, it would be very helpful to set expectations so communication doesn't cease upon a move to CA further isolating June.

No. Consistent with the above. This is a guardianship action to protect June, not establish a visitation schedule for the children. Each child is fully capable of calling and visiting June—regardless of what state. Moving is the last thing on the radar right now. As it stands, because your client pulled funding from litigating the A-Case, everyone's focus is on obtaining her house back and dealing with the fact June's husband is apparently dying. At the same time, as you have seen we are dealing with (1) a house in which is frozen due to a fraudulent claim of ownership by June's husband; and (2) an appeal. As you can imagine, it is a fairly difficult time for June.

- Is Kim willing to stipulate to dropping her mother off at Robyn's house maybe once per month – just as she takes June to doctors' appointments, or to Arizona for visits with Gerry and Teri - so that June can enjoy time with Robyn's family ?

Kim has no problem with Robyn picking June up to visit Robyn. I am sure these children can communicate if dropping June off is convenient. The process of June leaving the house is very simple and has not changed. The process is as follows: (1) June gets invited somewhere after talking with whoever is asking her to go somewhere; (2) June confirms if she wants to go and she asks Kimberly for a ride or arranges transportation with the person who wants to see her; (3) Kimberly is advised of the time and date for any such event, so she can make sure she is available. If Robyn wants to see June, the default option is she should have to drive to pick June up. That makes the most logical sense.

Absent obtaining stipulations, we will be petitioning the Court for such orders.

I don't know what your petition will state. Your client is complaining about non-existent issues. While I don't fault you for having to relay your client's position—the Court has made clear that June is free to make these basic social decisions. June has been out with her family extensively, including Robyn. June has her own attorney – who as I understand has consulted with June on these very issues. Do what you need to, but any petition will be opposed and June will not be happy Robyn is forcing her estate to spend more money to enforce her wishes.

As always, feel free to call me at any time to discuss any aspect of this matter.

I too am always free for a call. However, I want to stress that the estate is burning through money to advance the real claims at issue here. These claims should be the focus, because June continues to suffer financially and mentally from all of this litigation. To add fuel to the fire, her husband is dying, has ignored her, and continues to play mind games with her.

John P. Michaelson, Esq. | MICHAELSON & ASSOCIATES, LTD. | [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com) | 702.731.2333

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## Maria Parra-Sandoval

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**From:** Maria Parra-Sandoval  
**Sent:** Friday, September 18, 2020 5:17 PM  
**To:** 'John Michaelson'  
**Cc:** 'Patrick McDonnell'  
**Subject:** RE: Kathleen June Jones

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi John,

Right now we/Legal Aid Staff has been instructed to avoid in-person communications. I had to get special permission for the upcoming mediation on 9/30 to attend in person. Furthermore, I have spoken to June today, and she is adamant that she doesn't want anything that looks like a "visitation schedule" or "communication schedule." Also, does Robyn videotape June while asking her questions? It makes June uncomfortable.

You mentioned in court yesterday how I'm not "interested" in engaging with you about "visitation issues." Judge Marquis made it very clear she is not inclined to issue visitation orders in adult guardianship cases. I just want to let you know that Legal Aid employs a client-centered model of representation with protected persons. We are to treat them as normal as possible and honor their preferences. June directs me. If you don't think I'm representing my client the way you think I should, I encourage you to bring this up to my supervisors, Jim Berchtold [jberchtold@lacs.org](mailto:jberchtold@lacs.org) and Debra Bookout [dbookout@lacs.org](mailto:dbookout@lacs.org).

I would be able to talk to you on the phone for about one hour max on 09/22 at noon. I don't know how fruitful that will be but I am available. My duty is to my client and I will continue to advocate for what she wants. I'm happy to listen to any communication suggestions you may have, but if you're going to suggest protocols that you want the guardian to employ, then this is why you need to file a pleading. Even if I think your suggestions are fantastic ideas, if my client turns them down, I can counsel her but I can't force her to agree to them.

Patrick, I've read your long email. If you wish to discuss the issues you brought up, you can bring those topics up during the conversation too. I do want to add though that relocation of a protected person is very common in many of my cases. As long as a Petition for Relocation is filed and my client consents to the move, I do not object to the move. As I said, Legal Aid attorneys follow a client-centered model.

Maria



Maria Parra-Sandoval, Esq.  
Attorney, Consumer Rights Project  
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[mparra@lacs.org](mailto:mparra@lacs.org)

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**From:** John Michaelson [mailto:[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)]

**Sent:** Thursday, September 17, 2020 5:09 PM

**To:** Maria Parra-Sandoval <[MParra@lacsn.org](mailto:MParra@lacsn.org)>

**Subject:** Kathleen June Jones

Maria, I just left you a vm re this. Would you be willing to have a brief in person meeting with me and my clients perhaps this coming Tuesday? We will of course maintain safety protocols and we want to respect your time – we could even agree to a time limit. We are willing to meet you wherever is convenient for you. We would like to have a face to face brief conversation re visitation and communication to see if we can come up with some solutions to make the situation better. Thank you for your consideration.

John P. Michaelson, Esq.

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[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)

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**The District**

2200 Paseo Verde Parkway, Suite 160

Henderson, Nevada 89052

\*Please send correspondence to Henderson address

**Downtown Summerlin**

1980 Festival Plaza Drive, Suite 300

Las Vegas, Nevada, 89135

**Reno**

5470 Kietzke Lane, Suite 300

Reno, Nevada 89511

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To ensure compliance with requirements imposed by the IRS Circular 230, we hereby inform you that any U. S. tax advice contained in this communication (including attachments, if any) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any matter addressed herein.



# EXHIBIT B

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Michael S. Zar, Esq. (SBN 265991) SUNDSTEDT & GOODMAN LAW OFFICES 7755 Center Avenue, 11th Floor Huntington Beach, CA 92647		TELEPHONE NO.: 714-960-9999	FOR COURT USE ONLY
ATTORNEY FOR (Name): Judgment Creditor Robyn Friedman			
NAME OF COURT: Superior Court of California - County of Orange STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center			
PLAINTIFF: In The Matter of the Guardianship of the Person and Estate of Kathleen June Jones, an Adult Protected Person DEFENDANT:			
APPLICATION FOR ENTRY OF JUDGMENT ON SISTER-STATE JUDGMENT <input type="checkbox"/> AND ISSUANCE OF WRIT OF EXECUTION OR OTHER ENFORCEMENT <input type="checkbox"/> AND ORDER FOR ISSUANCE OF WRIT OR OTHER ENFORCEMENT			CASE NUMBER: 30-2020-01163122-CU-EN-CJC

Judgment creditor applies for entry of a judgment based upon a sister-state judgment as follows:

1. Judgment creditor (name and address):  
Robyn Friedman  
2824 High Sail Court  
Las Vegas, NV 89117
2. a. Judgment debtor (name): Guardianship Estate of Kathleen June Jones
  - b. ☒ An individual (last known residence address): 6277 Kraft Avenue, Las Vegas, NV 89130
  - c. ☐ A corporation of (specify place of incorporation):
    - (1) ☐ Foreign corporation  
☐ qualified to do business in California  
☐ not qualified to do business in California
  - d. ☐ A partnership (specify principal place of business):
    - (1) ☐ Foreign partnership which  
☐ has filed a statement under Corp C 15700  
☐ has not filed a statement under Corp C 15700
3. a. Sister state (name): Nevada
  - b. Sister-state court (name and location): District Court Clark County, Nevada
  - c. Judgment entered in sister state on (date): 8/12/2020
4. An authenticated copy of the sister-state judgment is attached to this application. Include accrued interest on the sister-state judgment in the California judgment (item 5c).
  - a. Annual interest rate allowed by sister state (specify): 7.5%
  - b. Law of sister state establishing interest rate (specify): NRS 17.130, et seq.
5. a. Amount remaining unpaid on sister-state judgment: ..... \$ 57,742.16
  - b. Amount of filing fee for the application: ..... \$ 40.00
  - c. Accrued interest on sister-state judgment: ..... \$ 522.05
  - d. Amount of judgment to be entered (total of 5a, b, and c): ..... \$ 58,304.21

(Continued on reverse)



1 **NNOP**  
2 MICHAELSON & ASSOCIATES, LTD.  
3 John P. Michaelson, Esq.  
4 Nevada Bar No. 7822  
5 john@michaelsonlaw.com  
6 Ammon E. Francom, Esq.  
7 Nevada Bar No. 14196  
8 ammon@michaelsonlaw.com  
9 2200 Paseo Verde Parkway, Ste. 160  
10 Henderson, Nevada 89052  
11 Ph: (702) 731-2333  
12 Fax: (702) 731-2337  
13 *Attorneys for Robyn Friedman*  
14 *and Donna Simmons*

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 IN THE MATTER OF THE GUARDIANSHIP )	Case Number: G-19-052263-A
12 OF THE PERSON AND ESTATE OF: )	Department: B
13 )	
14 Kathleen June Jones, )	
15 )	Date of Hearing: 02/11/2021
16 An Adult Protected Person. )	Time of Hearing: 9:30 a.m.
17 )	

15 **NOTICE OF NON-OPPOSITION TO VERIFIED**  
16 **PETITION FOR COMMUNICATION, VISITS AND VACATION TIME WITH**  
17 **PROTECTED PERSON**

17 Robyn Friedman and Donna Simmons ("Petitioners" or "Robyn" and "Donna"), by and  
18 through their counsel John P. Michaelson, Esq., of Michaelson & Associates, Ltd., hereby files  
19 notice to the Court that no opposition had been timely filed to Robyn Friedman's and Donna  
20 Simmons' Verified Petition for Communication, Visits, and Vacation Time With Protected  
21 Person filed December 30, 2020, in the above-captioned matter.

22 Pursuant to EDCR 5.502(c) any opposition thereto had to be filed "[w]ithin 14 days after  
23 service of the motion, . . . together with a memorandume of points and authorities . . ."

24 ///

25 ///

1 Accordingly, any opposition was due by January 13, 2021.

2 DATED: January 25, 2021.

3 MICHAELSON & ASSOCIATES, LTD.

4 By:  (for) #13281

5 John P. Michaelson, Esq.  
6 Nevada Bar No. 7822  
7 Ammon E. Francom, Esq.  
8 Nevada Bar No. 14196  
9 2200 Paseo Verde Parkway, Suite 160  
10 Henderson, Nevada 89052  
11 Attorneys for Robyn Friedman  
12 and Donna Simmons  
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and NEFCR 9, the undersigned hereby certifies that on the 25<sup>th</sup> day of January, 2021, a copy of the foregoing Notice of Non-Opposition to Objection to Verified Petition for Communication, Visits and Vacation Time with Protected Person was mailed and/or eserved by regular US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada, to the following individuals and/or entities at the following addresses:

Jeffrey R. Sylvester <a href="mailto:jeff@sylvesterpolednak.com">jeff@sylvesterpolednak.com</a>  Kelly L. Easton <a href="mailto:kellye@sylvesterpolednak.com">kellye@sylvesterpolednak.com</a>  Co-Counsel for Petitioners, Robyn Friedman and Donna Simmons	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada <a href="mailto:mparra@lacs.nv.gov">mparra@lacs.nv.gov</a> <i>Attorney for Kathleen June Jones</i>  Penny Walker <a href="mailto:walker@lacs.nv.gov">walker@lacs.nv.gov</a>  <i>Counsel for June Jones</i>
Geraldine Tomich, Esq. <a href="mailto:gtomich@maclaw.com">gtomich@maclaw.com</a>  James Beckstrom, Esq. <a href="mailto:jbeckstrom@maclaw.com">jbeckstrom@maclaw.com</a>  Cheryl Becnel <a href="mailto:cbecnel@maclaw.com">cbecnel@maclaw.com</a>  <i>Attorneys for Kimberly Jones</i>	Kate McCloskey <a href="mailto:NVGCO@nvcourts.nv.gov">NVGCO@nvcourts.nv.gov</a>  LaChasity Carroll <a href="mailto:lcarrol@nvcourts.nv.gov">lcarrol@nvcourts.nv.gov</a>  Sonja Jones <a href="mailto:sjones@nvcourts.nv.gov">sjones@nvcourts.nv.gov</a>

1 2	Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Teri Butler 586 N. Magdalena Street Dewey, AZ 86327
3 4	Jon Criss 804 Harkness Lane, Unit 3 Redondo Beach, CA 90278	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
5 6		Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832

MICHAELSON & ASSOCIATES, LTD.

/s/ Lenda L. Murnane  
Employee of Michaelson & Associates



1 **Marquis Aurbach Coffing**  
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12 Attorneys for Kimberly Jones

7 **DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 In the Matter of the Guardianship of the Person  
10 and Estate of:

Case No.: G-19-052263-A  
Dept. No.: B

11 KATHLEEN JUNE JONES,

12 An Adult Protected Person.  
13

14 **OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND**  
15 **VACATION TIME WITH PROTECTED PERSON**

16 COMES NOW, Kimberly Jones, as Guardian of the Person and Estate of Kathleen June  
17 Jones ("Ms. Jones"), through the law firm of Marquis Aurbach Coffing, hereby files the following  
18 Opposition to Petitioners Robyn Friedman and Donna Simmons' Verified Petition for  
19 Communication, Visits, and Vacation Time with Protected Person. This Opposition is based upon  
20 papers and pleadings on file herein, the attached Memorandum of Points and Authorities, and any  
21 oral argument permitted at the time of the hearing on this matter.

22 Dated this 25th day of January, 2021.

23 MARQUIS AURBACH COFFING

24 By /s/ James A. Beckstrom  
25 Geraldine Tomich, Esq.  
26 Nevada Bar No. 8369  
27 James A. Beckstrom, Esq.  
28 Nevada Bar No. 14032  
10001 Park Run Drive  
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Attorneys for Kimberly Jones



**MEMORANDUM OF POINTS AND AUTHORITIES****I. INTRODUCTION AND STATEMENT OF FACTS**

The Petition continues to be the most recent filing wherein June's clearly stated desires are challenged through a collateral attack against the Guardian, Kimberly Jones. There is no dispute June has voiced her opinion on these issues time and time again. Through June's Court appointed counsel, this Court has been informed on a number of occasions that June does not want the Court controlling who, when, and how she talks to her family. This includes Petitioners, Robyn and Donna. Nonetheless, Kimberly is forced to defend her mother's desires through yet additional costly motion practice.<sup>1</sup>

Petitioners now seek to subvert June's clearly stated desires and impose a series of absurd conditions on June and her Guardian. The crux of Petitioner's request has nothing to do with June and everything to do with their own well-being—something this Court has no authority to entertain. This Court is limited by the confines of NRS 159, which were solely designed to protect June. NRS 159 does not confer any rights of "visitation" or "preferential communication" upon a third-party. NRS 159 is intended to advance the health, well-being, and desires of the protected person—no one else.

While Kimberly remains flexible and willing to assist June with seeing her family, Kimberly is required to acknowledge and protect June's personal wishes. June has made clear she (1) doesn't want a "schedule" for calls or in-person visits with Robyn or Donna; (2) wants to make the decision about who she talks to or visits with; and (3) doesn't want her estate incurring yet additional expense to handle sibling rivalry.

Notwithstanding June's wishes, it is unreasonable to suggest that two of June's daughters are entitled to some specialized course of treatment. Even a cursory review of the relief sought reveals that Robyn and Donna want to impose burdensome conditions on Kimberly. This includes the following demands, highlighted for the Court.

///

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<sup>1</sup> To preserve costs, Kimberly addresses the material arguments advanced by Petitioners.

**MARQUIS AURBACH COFFING**

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

Petitioner's Request	Response
"Kim is responsible for facilitating scheduled communications, visits, and vacations" (Pet. at ¶ 83(a))	Kimberly is not the family travel agent. Kimberly is only required to confer with June as to what she wants to do and act in June's interest to facilitate her wishes. Kimberly has no duty or obligation to be "responsible" for facilitating communications, visits, or vacations. Moreover, such a restriction directly contradicts with June's desires and her rights under the Guardianship Bill of Rights. NRS 159.328(1)(i).
"Kim is to drive Ms. Jones to the local family visits 50% of the time." (Pet. at ¶ 83(b))	Kimberly is not public transportation and if June's family wants to see her, they should be responsible for driving to see or pick-up June.
". . . Kim must leave the home when family visitors come to see June . . ." (Pet. at ¶ 83(c))	No authorization for such a request exists. Kimberly is the live-in guardian for June. She is responsible for her health, well-being, and daily care. Moreover, such a restriction directly contradicts with June's desires and her rights under the Guardianship Bill of Rights. NRS 159.328(1)(i).
Kim is to make June call her family "one to two times a week at set times when the family members are likely to answer" (Pet. at ¶ 83(d))	Petitioners do not unilaterally decide that June is required to check in with every member of her family at preset dates and times. Moreover, it is the epitome of irony for Petitioners to demand such calls be made when it is convenient to them. Moreover, such a restriction directly contradicts with June's desires and her rights under the Guardianship Bill of Rights. NRS 159.328(1)(i).
There will be a "standing call time to check-in with family once or twice a week, or ten minutes set aside each week where <i>"Kim calls all of Ms. Jones' family, including the grandchildren."</i> (Pet. at ¶ 83(e))	Absurd. Micromanaging like this is not authorized in NRS 159 and such a schedule is unrealistic and burdensome. If June's family wants to talk to her, they can pick-up the phone or come to see her. Moreover, such a restriction directly contradicts with June's desires and her rights under the Guardianship Bill of Rights. NRS 159.328(1)(i).
"Kim is 'mandated' to provide weekly updated to Petitioners regarding Ms. Jones' physical travel plans . . ." (Pet. at ¶ 83(g))	The world does not revolve around Petitioners. No such "mandated" reports are implicated in NRS 159 and this request does nothing to advance the health and wellbeing of June. Moreover, such a restriction directly contradicts with June's desires and her rights under the Guardianship Bill of Rights. NRS 159.328(1)(i).

1 2 3 4	“Any communications between Kim and Petitioners will be confirmed in writing.” (Pet. at ¶ 83(h))	Barring Kimberly and Petitioners from speaking orally is senseless. Kimberly is already busy enough managing June’s declining physical and mental condition, Petitioners’ demands are burdensome and unjustified.
5 6 7	“The Court directs Kim to provide ‘straightforward answers’ to questions raised in text messages ‘promptly.’” (Pet. at ¶ 83(i))	Petitioners are not empowered to get what they want. This Court has ordered good faith communication, which is exactly what has occurred. Burdening the Guardian with additional tasks is abusive.
8 9 10 11	That this Court adopt a visitation schedule and apply it to “all Ms. Jones’ family.” (Pet. at ¶ 83(k))	The only parties who seek absurd visitation schedules are Petitioners. The remainder of June’s family has never voiced any of the concerns raised by Petitioners. Moreover, such a restriction directly contradicts with June’s desires and her rights under the Guardianship Bill of Rights. NRS 159.328(1)(i).
12 13 14	Order vacation time for June with her local and distant family.	June is capable of expressing whether she wants to vacation with family and where. Kimberly has always assisted vacation planning.

15 None of these demands are appropriate and none of the demands are realistic. There is also  
16 no reason to force June or Kimberly to mediation that is used for child-custody cases. June is not  
17 a child and her interests are extremely guarded by this Court. June already has a court appointed  
18 attorney who is highly competent in Guardianship proceedings and has been extensively involved  
19 in this case. Further oversight would unnecessarily complicate these proceedings. The same  
20 applies to imposing the use of a third-party communication system. It is only Petitioners who claim  
21 they need this system of communication. June regularly communicates with her family and forcing  
22 Kimberly to document this in a third-party application would not only be highly burdensome, but  
23 would further restrict June’s social interaction. June is unable to access an online application to  
24 communicate with her family, but is capable of using her phone. Restricting June from using her  
25 phone to speak to her family would further isolate her, not help her.

26 Separate and apart from these demands, Petitioners seek attorney fees and costs incurred  
27 for bringing their petition before this Court. Petitioners’ have already obtained a judgment of  
28 \$57,742.16 for legal expenses billed by Mr. Michelson. It would be absurd to award a dollar more

1 of attorney fees. None of the relief sought advanced any interests of June and Kimberly has never  
2 “restricted” June from seeing or communicating with any of her family members.

3 **II. LEGAL ARGUMENT**

4 **A. PETITIONERS’ ADVANCE TO ACTIONABLE CLAIM SUPPORTING**  
5 **THE RELIEF SOUGHT.**

6 Petitioners’ brief is a list of demands that blames the Guardian for every conceivable action  
7 imaginable. NRS 159.332(1)(a) requires the showing that Kimberly has restricted June’s access to  
8 her family against her will. Conveniently, the Petition references this authority with nothing more  
9 than a cursory citation. Lacking is any plausible allegation that June has ever been restricted from  
10 communicating with her family. The only argument advanced by Petitioners are examples of  
11 “Robyn receiving no telephone calls from June.” (Pet. at ¶ 58(a)-(e)). Lacking is any authority  
12 requiring June to call Robyn. While it is unfortunate Robyn doesn’t feel she is speaking to her  
13 mother enough, such a situation doesn’t fall on the shoulders of Kimberly, nor does it rise to the  
14 level of conduct described in NRS 159.332(1)(a). Robyn and Donna have failed to provide the  
15 Court with evidence that their attempts to speak with June have gone unanswered. Such evidence  
16 would include (1) records indicating June and/or Kimberly constantly ignore telephone calls; or  
17 (2) records indicating June has not seen or communicated with her family.

18 Moreover, while Kimberly avoids responding to every conceivable position of opinion  
19 advanced by Petitioners, Kimberly notes that Donna’s representations to this Court are nothing  
20 short of misleading. (Pet. at ¶ 43 stating “Donna has not seen or spoke to Ms. Jones for a very long  
21 time.”). Donna has had extensive communication and in-person visits with June. A sampling of  
22 those visits and communications are as follows:<sup>2 3</sup>

- 23 • December 30, 2019: Donna was staying at Green Valley Ranch Hotel, she asked if  
24 she could see June, picked up June from her house, and later that evening Kimberly  
25 drove to Green Valley Ranch and pick June up. Donna was supposed to see June  
again the next day, December 30, but Donna canceled.

26 \_\_\_\_\_  
27 <sup>2</sup> Kimberly verifies each of these facts pursuant to NRS 53.045, see *infra*.

28 <sup>3</sup> See Text Messages between Kimberly and Donna, attached as **Exhibit 1**.

- 1 • January 13, 2020: Kimberly texted Donna letting her know she was in California  
2 and asked if she wanted to see June. The three of them spend considerable in-person  
time together from January 15 to January 16.
- 3 • February 22, 2019: Kimberly offered to bring June to California on the February  
4 26 for a few days. Donna would not commit to seeing June on any particular day.  
Thereafter, on February 23, 2020, after she was asked again, Donna responded that  
5 she couldn't see June anytime soon, because life was too chaotic.
- 6 • February 25, 2020: June and Kimberly contacted Donna to get dinner, but Donna  
refused.
- 7 • February 26, 2020: June called and texted Donna, but Donna would not agree to  
8 see June or answer the phone. Donna's only concern was where June's phone was.
- 9 • April 12, 2020: Kimberly texted Donna to let her know June was calling her, Donna  
didn't answer.
- 10 • May 11, 2020: Kimberly texted Donna to let her know June was calling. Donna  
didn't answer.
- 11 • September 17, 2020: Kimberly called and texted Donna regarding dinner.  
12 Kimberly, June, and Donna all had dinner together.
- 13 • September 18, 2020: Kimberly asked Donna if she wanted to see June between  
14 October 19, 2020 through October 21, 2020. On or about September 19, 2020,  
Donna and Kimberly agreed that they both would communicate with one another  
15 when they were coming to Las Vegas or going to Orange County, CA.
- 16 • October 19, 2020 through the October 21, 2020: Kimberly dropped June off at  
17 Donna's house California. June, Donna, and some of Donna's family went on a  
boat ride on the lake. Kimberly talked to Donna and said she didn't want any  
visitation or schedule; she didn't want to be involved with texting either and we  
18 agreed to just call each to coordinate visits with June.
- 19 • November 30, 2020: Kimberly took June over to Donna's house in California.
- 20 • December 24, 2020: June called Donna on Christmas Eve. Donna didn't answer so  
Kimberly made a video of June singing a Christmas Carol and sent it. Donna and  
her son sent one back in return.

21  
22 As for June communicating with the rest of her family and friends, June has extensive and  
23 regular communication via Facetime and telephone calls. Kimberly has never refused contact with  
24 June when her family calls or comes to visit. This includes, but is not limited to, June's brother  
25 Dawn, his wife Judy, and granddaughter Jennifer, daughter Teri, son-in law Jack, Donna,  
26 granddaughter Tiffany, former co-worker and friend Marilyn, and anybody else who calls her.<sup>4</sup> It

27  
28 <sup>4</sup> See e.g., Declaration of Teri Butler, attached as **Exhibit 2**.

1 is unnecessary to canvas June on these issues. June's attorney can request this information and  
2 make a diligent investigation into the allegations raised by Petitioners address any such concerns  
3 with the Court as she feels necessary.

4 To the extent Petitioners assert that NRS 200.5092(4) provides them any authority for the  
5 relief sought, that too is incorrect. NRS 200.5092 is a criminal statute governing exploitation and  
6 isolation, where a person is restricted from having contact with another person. Again, no such  
7 action has ever occurred in the case of June. Kimberly equally assists June is speaking to her entire  
8 family, which includes Petitioners. June has been persistent that Petitioners should have the same  
9 access June's other family members have—the unobstructed ability to call, visit, and ask her to  
10 see them. This is exactly what has happened. Separately, no private right of action rests in NRS  
11 200.5092.

12 To the extent Petitioner asserts that June is being "isolated" to such an extent that June's  
13 health and safety cannot be confirmed, such claims are serious allegations, unfounded, and not  
14 cured through a visitation schedule. Should this Court feel June is not safe with Kimberly, the  
15 Court must employ other measures to ensure June is properly cared for. As stated, June has  
16 extensive communication with her court appointed counsel, family members, and regularly travels  
17 to see her family. If the concern is "isolation" and "danger" a visitation schedule for two of June's  
18 daughters doesn't change that.

19 The crux of this dispute is that June's wishes must be followed to the greatest extent  
20 possible. Pursuant to NRS 159.328(1)(i), June is entitled to make decisions regarding her social  
21 life and interaction to the greatest extent possible. Petitioners' personal preference, opinion, and  
22 desires do not limit these protections afforded to June.

23 **B. THE COURT SHOULD DEFER TO JUNE AND HER COUNSEL AS TO**  
24 **WHAT METHOD OF COMMUNICATION SHE PREFERS.**

25 Petitioners seek the use of Talking Parents. As stated, Kimberly defers to the Court's  
26 decision on this issue, but has extensive concerns. First, Kimberly should not be required to take  
27 any special action as it applies to communication between Petitioners and June. Rather, Petitioners  
28 should have the same access to June as the rest of her family has. Neither June, nor Kimberly want

1 to be burdened with set schedules or unilateral visitation demands. Second, this Court must realize  
2 that Kimberly is already subject to an immense task in caring for June. June requires constant  
3 supervision and support and is involved in extensive adversarial litigation. It is inappropriate to  
4 also place the burden of coordinating every visit with Petitioners on the shoulders of Kimberly.  
5 Moreover, the very antidote proposed by Petitioner to solve the non-existent problem of visitation  
6 would not help June, it would further harm her. June has asked to participate in her social life,  
7 enjoys communicating with her children, and she benefits from having this limited ability to  
8 control her life. Petitioner's request to take the remaining independence from June is exactly  
9 opposite of what is in her best interest and what she desires.

10 Finally, to the extent a third-party application is assigned to the parties in this case,  
11 Kimberly requests that no specific time-frame or "check-in" be required and asks the Court to  
12 clarify what information would have to be transmitted on the application. Petitioners have no  
13 heightened right to information as it applies to June. Kimberly reports to this Court, not every  
14 individual family member affiliated with June. It would be highly burdensome for Kimberly to  
15 have to provide detailed updates at the tip of a hat to any family member affiliated with June. To  
16 the extent the Court wants a third-party application to serve as an overview of Kimberly providing  
17 general updates on June, fine. However, Kimberly should not be inundated with requests for  
18 information and demands for immediate responses from Petitioners.

19 As for the request for mediation, Kimberly defers to June's desire on this issue. Kimberly  
20 believes that mediation would not be helpful. The parties' positions are clearly stated to this Court,  
21 and the Court is fully capable of handling the issues raised by Petitioners.

22 **C. PETITIONER'S REQUEST FOR FEES MUST BE DENIED AND THE**  
23 **GUARDIAN'S FEES SHOULD BE AWARDED.**

24 Petitioners' seek fees pursuant to NRS 159.338. For fees to issue, this Court must find that  
25 Kimberly "acted frivolously and in bad faith in prohibiting and restricting communication,  
26 visitation or interaction between the relative or person of natural affection and the protected  
27 person." NRS 159.338(1)(b). No such finding can issue, because none of the asserted claims of  
28 restricting visitation or communication are true. What is true, is that this issue of visitation has



1 been dealt with time and time again, wherein June has made clear that her desires are contrary to  
2 Petitioners. Despite this, June, through her estate and her Guardian have been required to expend  
3 considerable resources opposing the Petition. Thus, should any fees be awarded, it is fees in favor  
4 of June, to her Guardian, based on bad faith failing by Petitioners. *See* NRS 159.338(1)(a)(1).

5 **III. CONCLUSION**

6 Based on the foregoing, the Petition should be denied.

7  
8 Dated this 25th day of January, 2021.

MARQUIS AURBACH COFFING

9  
10 By /s/ James A. Beckstrom  
11 Geraldine Tomich, Esq.  
12 Nevada Bar No. 8369  
13 James A. Beckstrom, Esq.  
14 Nevada Bar No. 14032  
15 10001 Park Run Drive  
16 Las Vegas, Nevada 89145  
17 *Attorneys for Kimberly Jones, as*  
18 *Guardian of the Person and*  
19 *Estate of Kathleen June Jones*  
20  
21  
22  
23  
24  
25  
26  
27  
28

**VERIFICATION OF KIMBERLY JONES IN SUPPORT OF OPPOSITION**

Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing content within this Opposition is true and correct.

/s/ Kimberly Jones

Kimberly Jones

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 25th day of January, 2021. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:<sup>5</sup>

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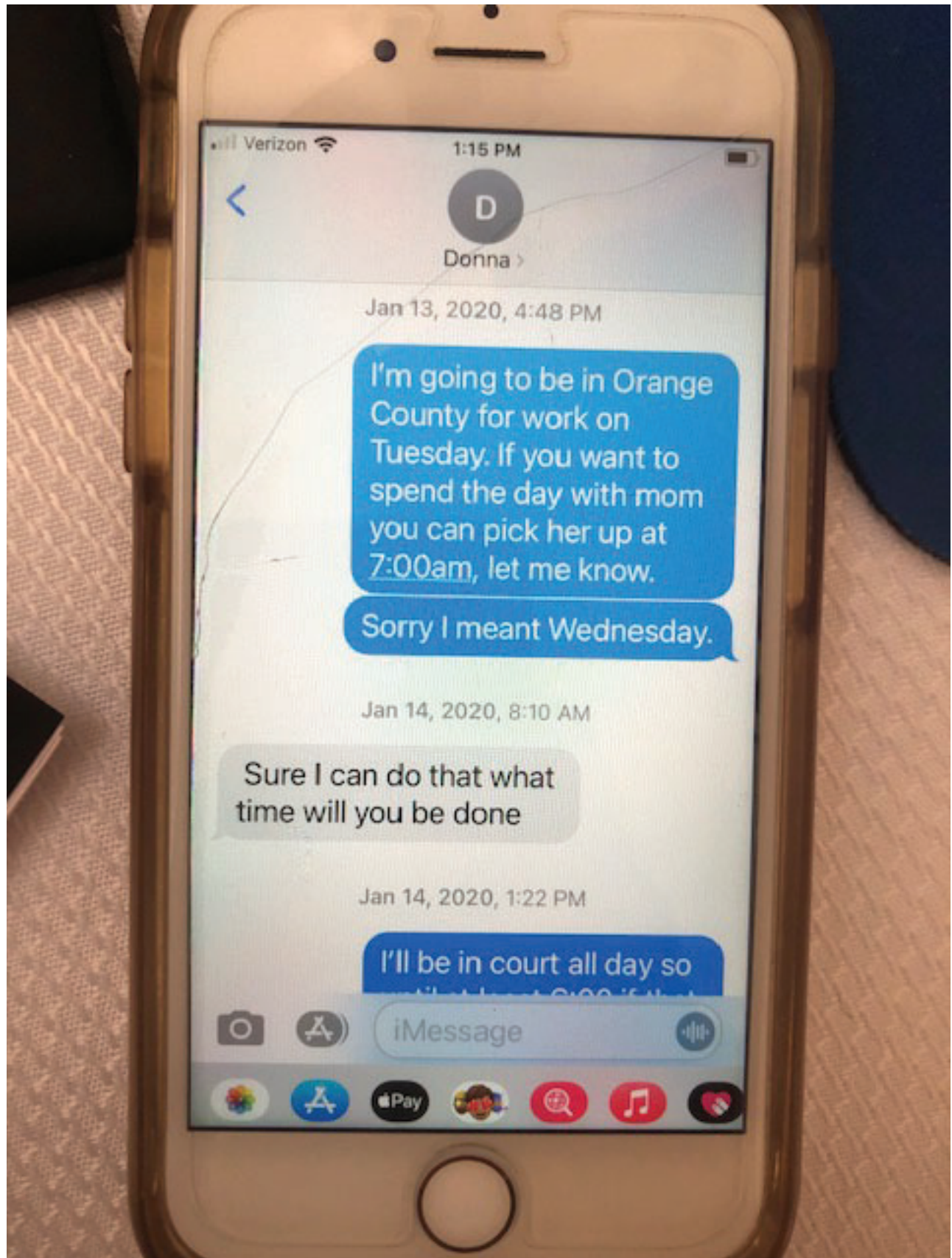
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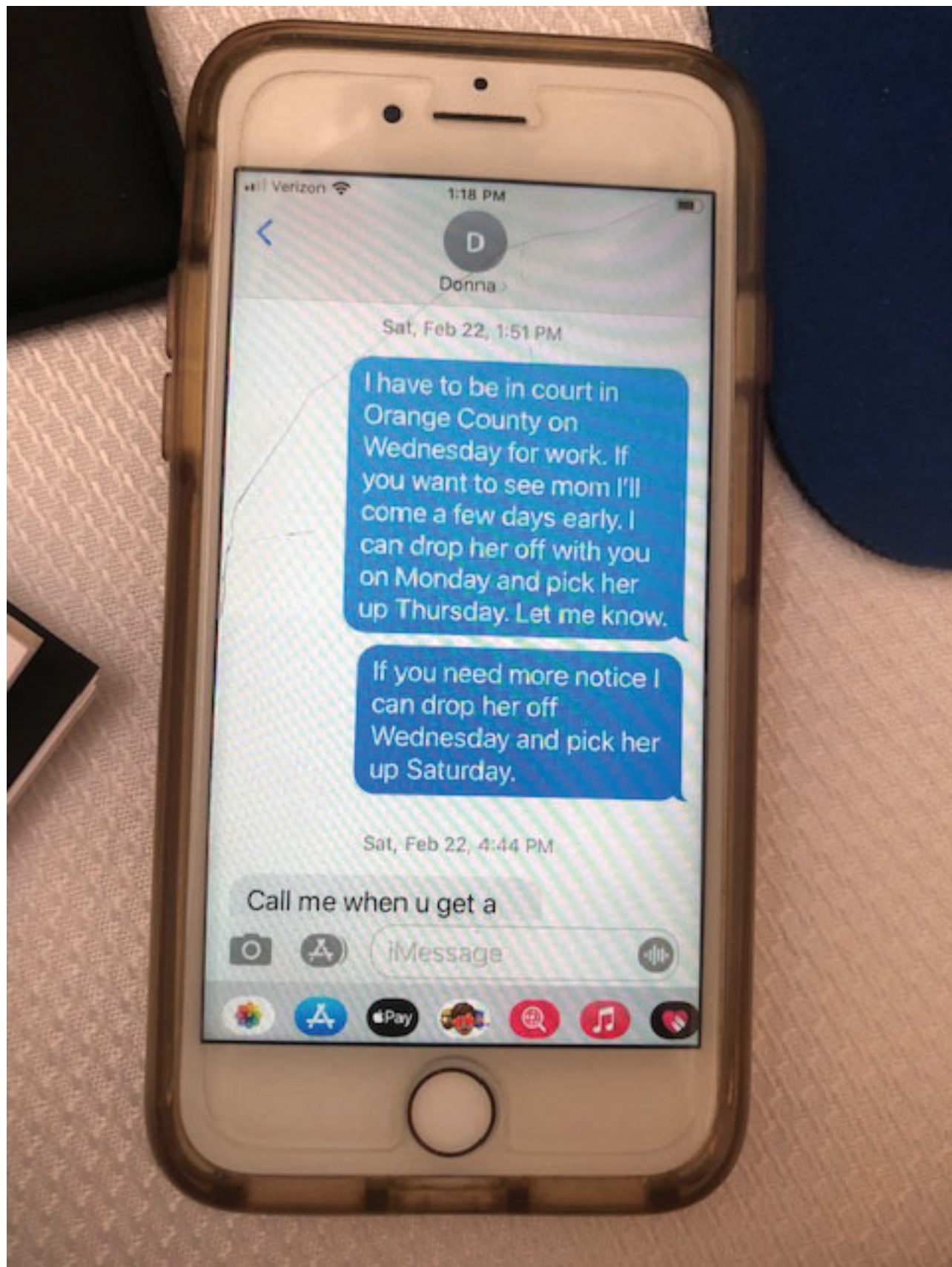
/s/ Cheryl Becnel  
An employee of Marquis Aurbach Coffing

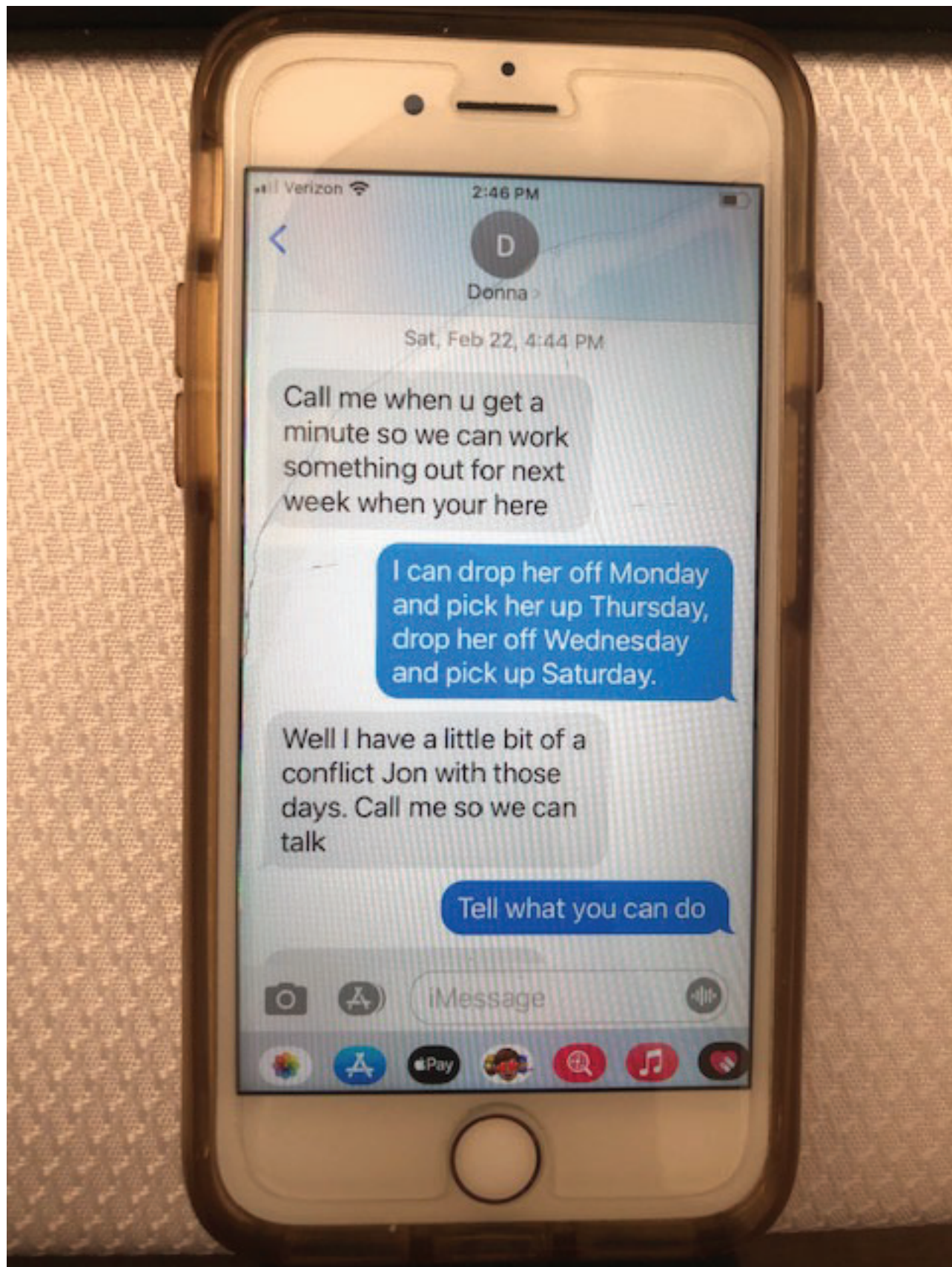
<sup>5</sup> Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

# Exhibit 1



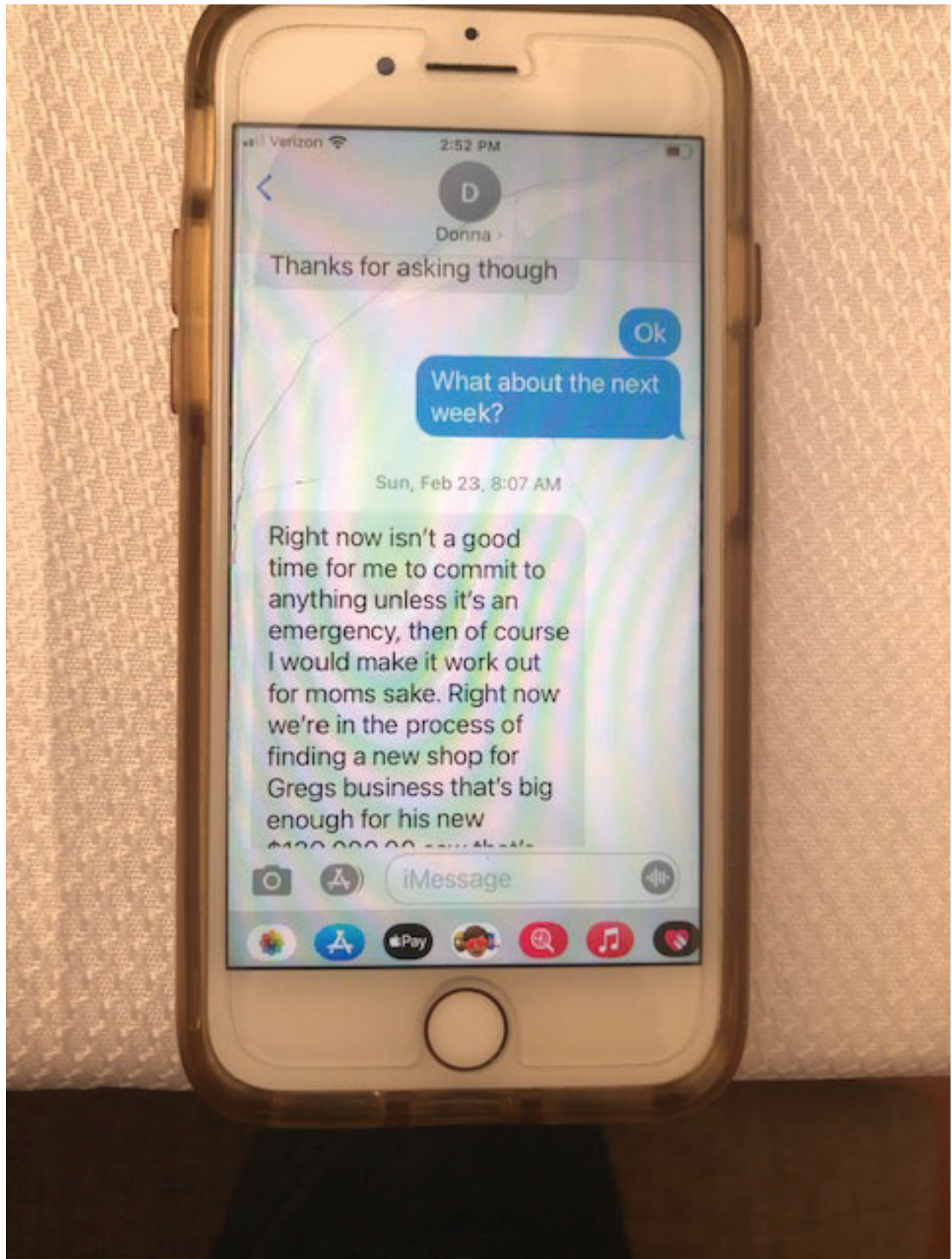




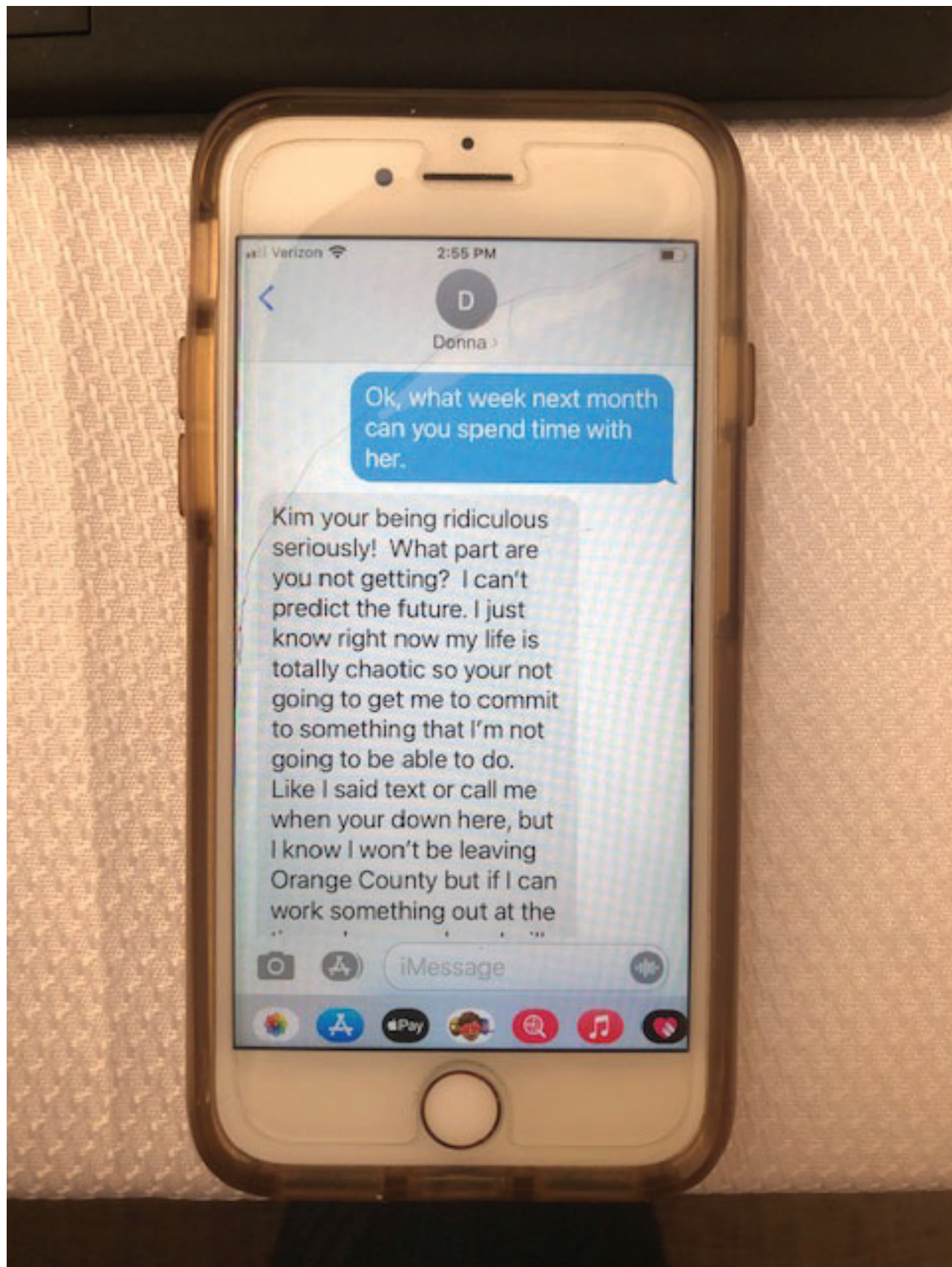












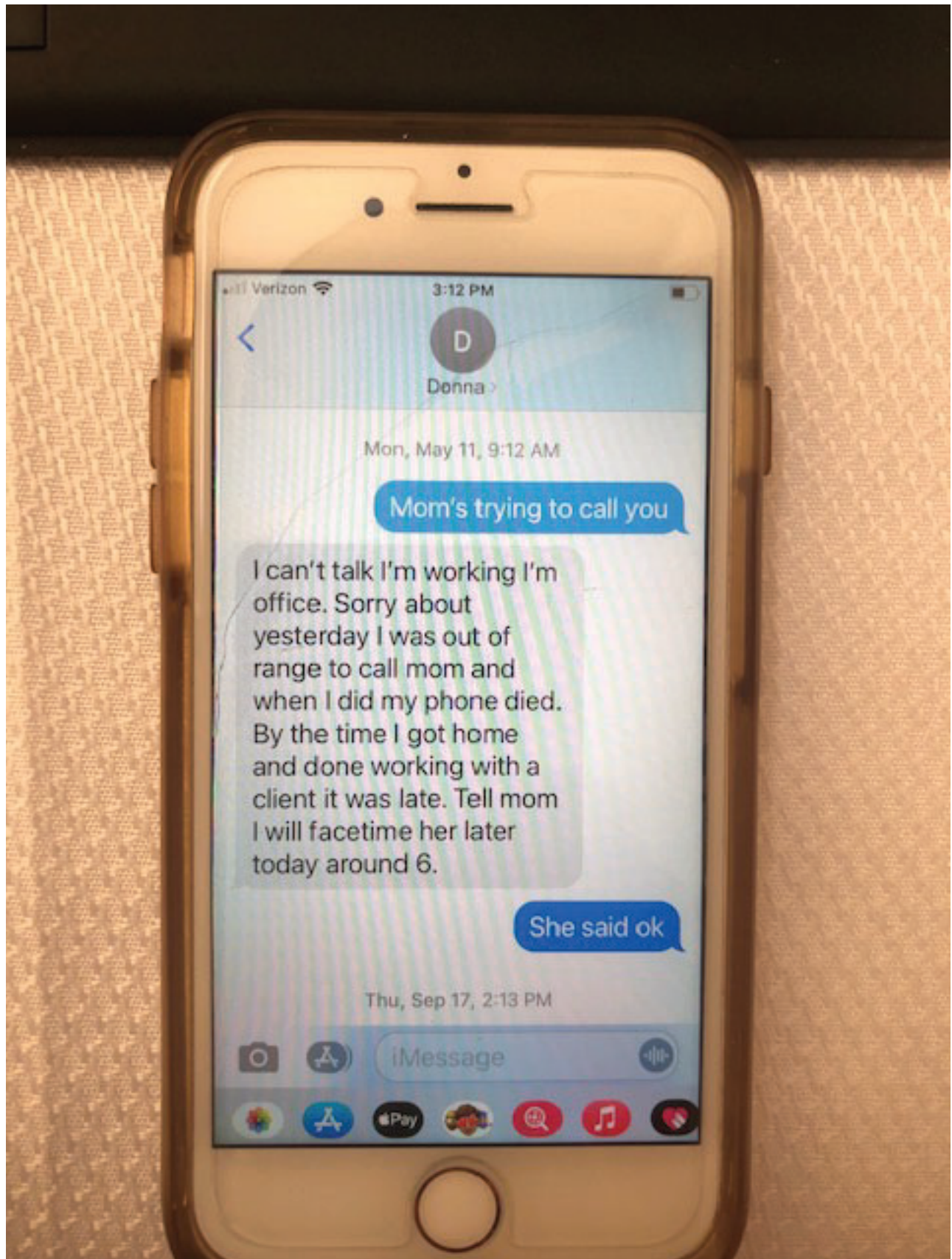




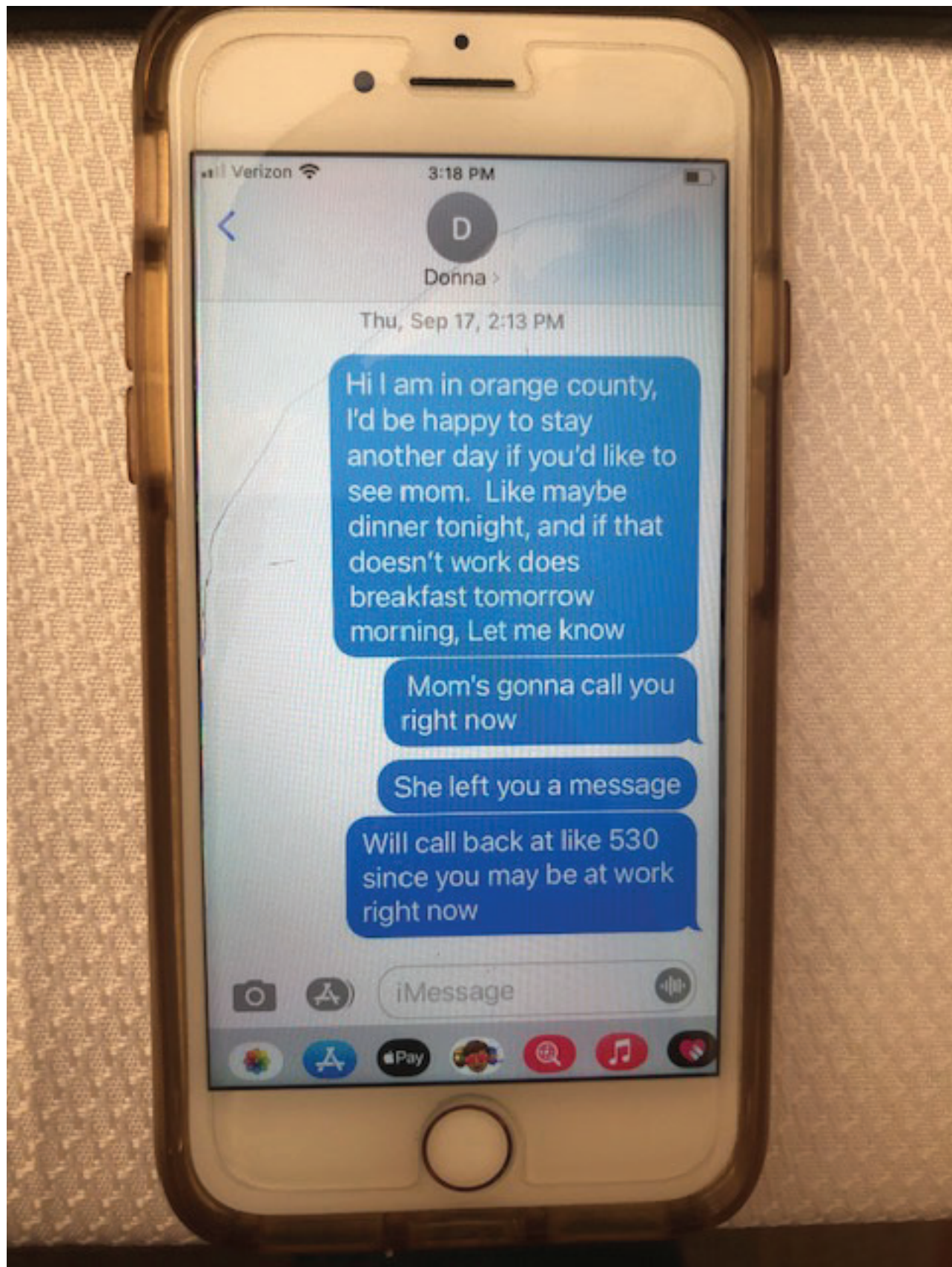


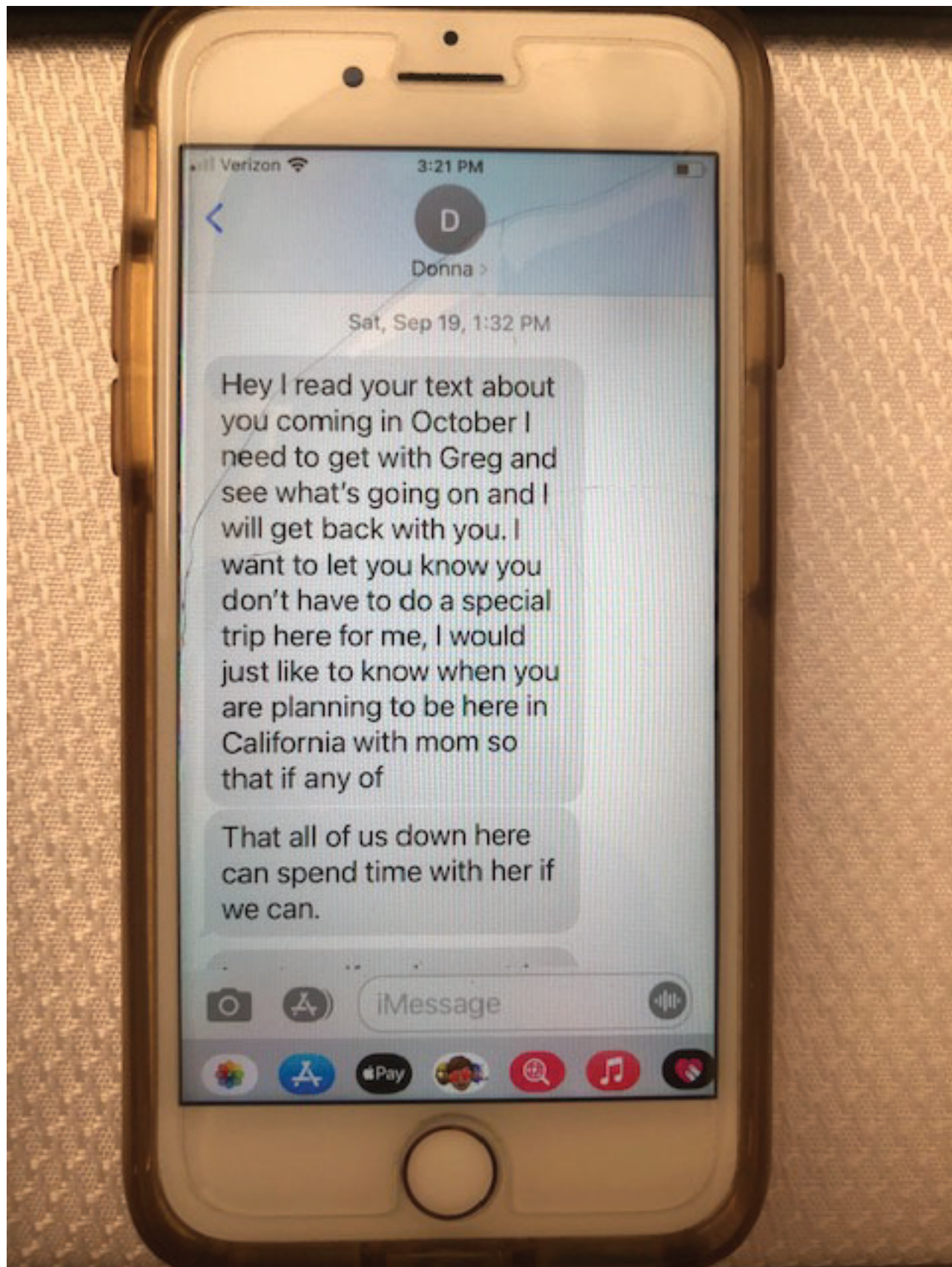




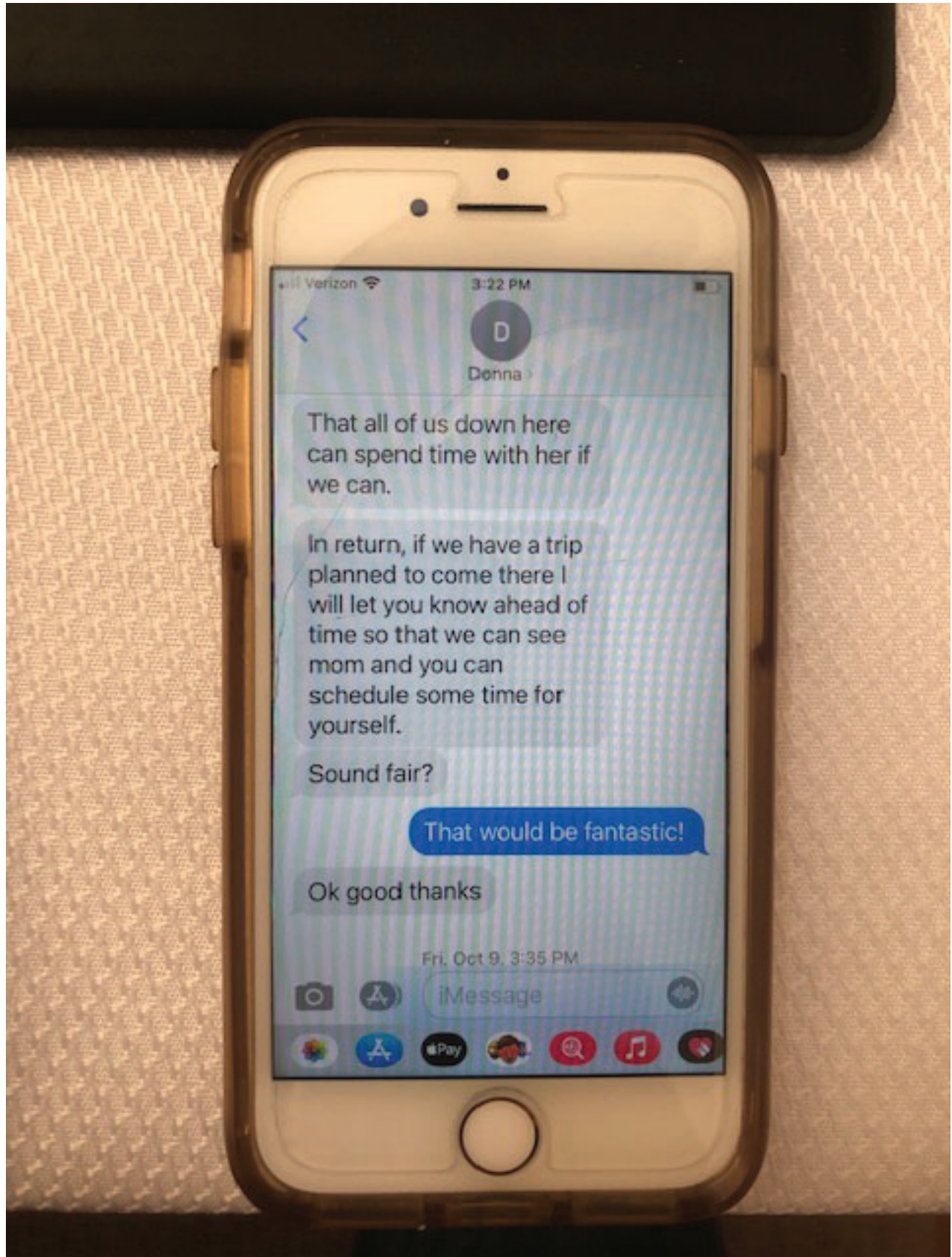












# Exhibit 2

DECLARATION OF TERI BUTLER

Teri Butler, declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I have reviewed Robyn Friedman and Donna Simmons' Verified Petition for Communication, Visits, and Vacation Time with Protected Person.

3. I am the daughter of June Jones.

4. I live in Arizona, but regularly Facetime with my mother, speak with her on the phone, and visit her.

5. My husband and two kids also regularly communicate with June through these methods of communication.

6. I regularly speak to Kimberly regarding my mom's health, social life, and the status of the Guardianship proceedings.


7. I have seen my mom in person approximately ten times in the last year.

8. When I have seen my mom, she has never expressed concerns of being isolated or not seeing her other children.

9. I do not feel my mother is being isolated by Kimberly and I believe Kimberly has and continues to do a wonderful job in ensuring my mother has had access to her entire family.

Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 24 day of January, 2020.

  
Teri Butler



**ROPP**

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Counsel for Robyn Friedman and Donna Simmons

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )

Kathleen June Jones, )

An Adult Protected Person. )

Case Number: G-19-052263-A

Department: B

Date of Hearing: February 11, 2021

Time of Hearing: 9:30 a.m.

**PETITIONERS' OMNIBUS REPLY TO:**

**(1) KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR  
COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON;**

**AND**

**(2) KATHLEEN JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR  
COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON**

☐ TEMPORARY GUARDIANSHIP

☐ Person

☐ Estate ☐ Summary Admin.

☐ Person and Estate

☒ GENERAL GUARDIANSHIP

☐ Person

☐ Estate ☐ Summary Admin.

☒ Person and Estate

☐ SPECIAL GUARDIANSHIP

☐ Person

☐ Estate ☐ Summary Admin.

☐ Person and Estate

☐ NOTICES / SAFEGUARDS

☐ Blocked Account

☐ Bond Posted

☐ Public Guardian Bond

COMES NOW Robyn Friedman and Donna Simmons ("Petitioners" or "Robyn" and  
"Donna"), as family members and interested parties in this matter, by and through the law firm,



1 Michaelson & Associates, Ltd., who respectfully submit to this Honorable Court this Omnibus  
2 Reply to: (1) Kimberly Jones' Opposition to Verified Petition for Communication, Visits, and  
3 Vacation Time with Protected Person ("Kim's Opposition"); and (2) Kathleen June Jones'  
4 Opposition to Verified Petition for Communication, Visits, and Vacation Time with Protected  
5 Person (LACSN's Opposition"), and hereby represent the following:

6 **MEMORANDUM OF POINTS AND AUTHORITIES**

7 **I. Introduction**

8 1. This matter is caught in an endless loop that requires Court intervention to break the cycle  
9 so all parties can move on. All parties agree that there is a guardianship for a reason. Counsel for  
10 the protected person agrees that Ms. Jones has a diminished capacity and even lacks capacity for  
11 certain activities. Counsel for the protected person also attached an email as Exhibit A where the  
12 same counsel admits that Ms. Jones has memory issues. Counsel for the guardian admits that Ms.  
13 Jones "requires constant supervision and support." See Kim's Opposition at 8:2-3. As Counsel  
14 for the protected person states, the issue before the Court is one of "grown women refus[ing] to  
15 work together with what should be simple logistics for setting up communication when June  
16 wishes to see a family member." See LACSN's Opposition at 6:5-7. With these admissions, it is  
17 astonishing that both attorneys stubbornly advance a broken, false, and repackaged narrative with  
18 the request that Court should not order the guardian to follow "simple logistics." In fact, counsel  
19 for both parties continue to talk past Petitioners' concerns and skip over the large majority of the  
20 points, facts, stories, and evidence presented by Petitioners in favor of a fabricated narrative.

21  
22 2. Petitioners only request that the Court order these "simple logistics" to ensure Ms. Jones'  
23 rights are protected. Contrary to LACSN's Opposition, Ms. Jones has repeatedly told Robyn that  
24 she wants to see and spend time with Robyn. When the stars align and Robyn gets time with her  
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1 mother, Ms. Jones has a lot of fun with Robyn's family. LACSN's narrative to the contrary – that  
2 Ms. Jones hates Robyn, and no one should be surprised that Ms. Jones doesn't want to spend  
3 time with Robyn – underlines and emphasizes the extreme disconnect between what counsel is  
4 representing to the Court and what Petitioners are experiencing in reality. All Petitioners want is  
5 for the Court to see the disconnect and to implement "simple logistics" for how situations will be  
6 handled when Ms. Jones tells Petitioners that she wants to see them. Accordingly, Petitioners  
7 simply request that the Court intervene, utilize specific tools available to the Court and within the  
8 Court's discretion, and resolve the endless loop.

## 9 **II. Legal Argument**

### 10 **A. There is a Strong Disconnect Between Reality and What Counsel Represents to this** 11 **Court**

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13 3. As stated above, there is an extreme disconnect between what Counsel for the Protected  
14 Person is representing to the Court and what Petitioners are experiencing in reality. Counsel for  
15 the Protected Person states that Ms. Jones hates Robyn for what she is doing in this case and no  
16 one should be surprised that Ms. Jones does not want to see Robyn. *See* LACSN's Opposition at  
17 6:11-7:3. That is the exact opposite of what is playing out in reality.

18 4. Ms. Jones enjoys spending time with Robyn and her family. At times, Kim will assist in  
19 planning and carrying out these visits between Robyn and Ms. Jones. When this happens, Ms.  
20 Jones has a lot of fun with Robyn's family. For example, Robyn and her family rented a slingshot  
21 car for a recent visit with Ms. Jones. Riding in one of those vehicles is something Ms. Jones has  
22 mentioned she would like to try. Attached as Exhibit A to this Reply is a video from that recent  
23 visit showing Ms. Jones having a lot of fun as she drives around town with Robyn's family.  
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1           5. The problem is that Ms. Jones lacks the capacity to plan and follow through with visits on  
2 her own. Ms. Jones repeatedly informs Robyn that she would like to see Robyn. In fact, Ms. Jones  
3 has never informed Robyn that she does not want to see Robyn. The Petition is replete with recent  
4 example after example of Ms. Jones telling Robyn that she wants to visit. When this happens,  
5 Robyn tries to get Ms. Jones to plan a visit. The problem is that Ms. Jones lacks the capacity to do  
6 so. She lacks capacity to take her desire to the next level and do something about it. Without the  
7 guardian's assistance, Ms. Jones reverts to telling Robyn to call back later to plan the visit. Without  
8 "simple logistics," fulfilling Ms. Jones' stated desire to see her daughter cannot and will not happen  
9 because Ms. Jones cannot handle planning and carrying out visits.

10           6. Regardless of what the Oppositions say, the Petition is not about treating Ms. Jones like a  
11 child. The Petition is not about forcing Ms. Jones to do things that she does not want to do. The  
12 Petition is not about disregarding Ms. Jones' wishes. The Petition is about how to handle the  
13 "simple logistics" of helping Ms. Jones when she expresses her desire to her daughters that she  
14 wants to see them.

15           7. Indeed, LACSN's and Kim's own statements are an example of this disconnect. For  
16 example, Ms. Parra-Sandoval repeatedly states to the Court that Ms. Jones continues to forget that  
17 she lost the home located at 277 Kraft Avenue, Las Vegas, Nevada 89130 (the "Kraft Property")  
18 and that Ms. Parra-Sandoval has to constantly re-explain the situation to Ms. Jones every time it  
19 comes up. Ms. Parra-Sandoval informed this Court that she is the one that informed Ms. Jones that  
20 her husband died. LACSN's Opposition Exhibit A confirmed Ms. Parra-Sandoval's belief that Ms.  
21 Jones suffers from memory issues. Kim's Opposition concedes that Ms. Jones requires constant  
22 care and supervision. Yet, Ms. Parra-Sandoval now asks the Court to believe that Ms. Jones is  
23 capable of reading and comprehending all of the pleadings and papers filed in this matter on her  
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own without assistance. The reality is likely that Ms. Jones is getting her opinion from what she is being told by LACSN and Kim. Ms. Jones is mirroring and echoing what she is explained while being used by Kim and LACSN to push their own agendas. It is entirely irresponsible for Kim and LACSN to push this false reality that Ms. Jones is fully capable of providing for herself even after admitting that Ms. Jones suffers from memory issues, lacks capacity for certain activities, requires assistance to attend medical and legal appointments, and requires constant care and supervision.

8. Because of the extreme disconnect between reality and what is being represented to this Court by counsel for the guardian and the LACSN attorney, Petitioners strongly urge this Court to utilize tools available to the Court to make a finding as to what is really going on. This is in the best interest of everyone involved – especially Ms. Jones.

**B. Petitioners' Requests Are a Protection and Enforcement of the Protected Person's Bill of Rights**

9. This Court has authority to enforce the Protected Person's Bill of Rights on behalf of Ms. Jones. *See* NRS 159.327 through NRS 159.329.

10. Under NRS 159.328(d), Ms. Jones has the right for Robyn and Donna, as family members and interested parties, to raise issues of concern, including issues relating to a conflict with a guardian. Robyn and Donna are doing just that- raising concerns that Ms. Jones is unable to schedule visits with family on her own and follow through with those visits. This is simply something Ms. Jones cannot do for herself and that Kim Jones needs to do for her, as Ms. Jones' guardian, to comply with the Protected Persons Bill of Rights.

11. As has been stated repeatedly, upon information and belief, the guardian facilitates Ms. Jones' visits and other dealings with medical professionals and the court, among many others. Ms. Jones does not remember court hearing dates, get herself ready, and get to court or log in to BlueJeans on her own.

1 12. The Petition shows that Petitioners are trying to have meaningful communication and visits  
2 with their mother, Ms. Jones, during Ms. Jones' last years on this earth, and that Petitioners are  
3 having to fight against Kimberly's refusal to assist Ms. Jones with these contacts, along with  
4 Kimberly's undermining and interference with their communications and visits with Ms. Jones.

5 13. Under NRS 159.328(g), Ms. Jones has the right to have due consideration given to her  
6 current and previously stated desires regarding communication, visits and vacation time with  
7 family members other than those preferred by Kimberly. As stated above, though communications  
8 between Robyn and Donna and their mother are few, in each and every instance Ms. Jones  
9 continues to express her desire to see Petitioners, and Petitioners believe Ms. Jones thoroughly  
10 enjoys her time with them. This reality is in stark contrast to the picture painted in the LACSN  
11 Opposition – that Ms. Jones hates Robyn and should not be forced to spend time with her.  
12 Accordingly, it is appropriate that the Court intervene and utilize available tools to determine what  
13 Ms. Jones wants and what logistics should be utilized to assist her in having her desires met.

14 14. Under NRS 159.328(h), Ms. Jones has the right to remain as independent as possible and  
15 have her preference honored if it is reasonable. What is reasonable in this case is for Ms. Jones to  
16 have consistent communication and visits with Robyn and Donna that is not undermined,  
17 interrupted or ignored by Kimberly. What is reasonable is for Ms. Jones to receive assistance from  
18 her guardian to plan and carry out visits and communication when she expresses a desire to  
19 Petitioners to do so. This is exactly what the guardian does for many others – the Court, doctors  
20 and other family members. And for some reason, in the context of facilitating visits with many,  
21 many other individuals and organizations, neither the guardian nor the LACSN attorney feel that  
22 doing so is treating Ms. Jones "like a child". Upon information and belief, they do not tersely say  
23 to a doctor's office that inquiries about an appointment "quit treating her like a child! Why don't  
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1 you just call her?" Yes, Ms. Jones has the right to determine whether she wants to visit Petitioners.  
2 But when she states that she does want to visit, then she equally has a right for assistance. The  
3 issue here is that there is no agreed upon mechanism – no agreed upon “simple logistics” – to assist  
4 Ms. Jones in these situations. Kim is given far too much leeway to unilaterally impede, block, and  
5 stop these visits from occurring. And when Kim randomly decides to provide visits and  
6 communication between Ms. Jones and Petitioners, Kim’s randomness and incompleteness in  
7 planning makes each visit and communication a fight and deprives Ms. Jones of meaningful visits  
8 and communications.

9 15. Ms. Jones does not have capacity to follow through with scheduling visits and attending  
10 them without Kimberly’ assistance and oversight. Ms. Jones needs to be able to express her wishes  
11 to this Court so this Court can observe for itself Ms. Jones capabilities and limitations. Even  
12 LACSN and Kimberly agree that Ms. Jones lacks some capacity, requires constant supervision and  
13 care, cannot work online applications, and suffers from memory issues. Moreover, Petitioners  
14 submit that Ms. Jones struggles to use her cell phone on her own (supported by a video of her  
15 struggles) and suffers from dementia-type behavior (such as stating that she spoke to her dead  
16 husband months after he died). Yet, LACSN and Kimberly demand that this Court believe that  
17 Ms. Jones can handle planning visits and communication on her own simply because she says she  
18 can. This is why a Court canvass of Ms. Jones and an interview at FMC are critical.

19 20 16. Under NRS 159.328(l), Ms. Jones has the right to be treated fairly by Kimberly, including  
21 having Kimberly follow through with a needed Court order governing Ms. Jones’ communication  
22 and visits from family members Kimberly may dislike.

23 24 17. Under NRS 159.328(n), Ms. Jones has the right to receive telephone calls and personal  
25 mail and have visitors, UNLESS Kimberly AND this Court determine that particular



1 correspondence or a particular visitor will cause harm to Ms. Jones. There is no evidence that  
2 Robyn and/or Donna will cause harm to Ms. Jones, and there is no judicial determination of this.  
3 Thus, Kimberly' ongoing undermining and interfering with Ms. Jones' communication and visits  
4 from Robyn and Donna shown in the Petition for Communication and Visits is a violation of Ms.  
5 Jones' rights. Kimberly's refusal to assist Ms. Jones' with scheduling and following through with  
6 consistent communication and visits from Robyn and Donna is also a violation of Ms. Jones' right  
7 to receive telephone calls and receive visitors under NRS 159.328(n).

8 18. The Declaration of Teri Butler attached as Exhibit 2 to Kimberly's Opposition shows  
9 Kimberly is helping Ms. Jones to have Facetime visits, phone calls, and ten in-person visits with  
10 Ms. Jones daughter, Teri Butler and her family in Arizona, despite the long distance involved. It  
11 is unfortunate that Kimberly is not providing the same opportunity for Ms. Jones to communicate  
12 and visit with Robyn and Donna. Rather, Petitioners are having to file a necessary Petition and get  
13 a necessary Court Order for Kimberly Jones to provide equivalent facilitation for Ms. Jones to  
14 have communication and visits with Petitioners and their families as Kimberly is already providing  
15 for Teri Butler and her family.  
16

17 19. In fact, Kim's Opposition highlights and concedes the central issues presented to the Court.  
18 Kim plays favorites in deciding when to assist Ms. Jones in communicating and visiting with  
19 certain family members. She cherry picks who to coordinate with. Out of over fifteen family  
20 members, Kim assists Ms. Jones with seeing and talking to only those who support Kim in  
21 terminating the guardianship and reverting back to a power of attorney which has proven  
22 ineffective to protect Ms. Jones and in getting Kim to be transparent. If you agree with Kim's  
23 position, then you get visits. If you disagree, then you get left out. These other family members do  
24 not even try to reach out to Kim and Ms. Jones anymore because they have been burned by Kim  
25

1 in the past. Kim made is so difficult for these other family members that they gave up. Kim helps  
2 Ms. Jones visit and communicate with a handful of family members: Teri Butler, Teri's daughter  
3 Jen, Teri's son Jon, and Donna's daughter Tiffany. On the other hand, Kim deprives a much longer  
4 list of family members from communicating and visiting Ms. Jones including: Donna, Scott,  
5 Cameron, Cortney, Aria, Ryan, Sadie, Eastyn, Samantha, and Ampersand. All of this highlights  
6 an underlying issue which is that the Kim hates Robyn. The two did not speak for the immediate  
7 five years before this guardianship matter began. Kim's preexisting issues with Robyn are the  
8 cause of Kim's isolation of Ms. Jones from those who disagree with Kim. Kim should not be  
9 allowed to weaponize her position as guardian against her own family.

10 20. As stated in great detail in the Petition, Ms. Jones no longer regularly communicates with  
11 her family on her own. As stated in the Petition, Ms. Jones does not make any phone calls to  
12 Petitioners on her own, even when Petitioners and Ms. Jones agree that the phone calls will occur.  
13 The calls are non-existent. She requires assistance. Kim knows this which is why Kim will push  
14 to coordinate family visits and communications when she feels like she is under Court scrutiny.  
15 Then, when she does communicate, Kim will not answer basic questions. As stated in the Petition,  
16 Kim will do the minimum when assisting Ms. Jones including failing to answer Petitioners'  
17 questions about whether certain trips (such as going to Brian Head, UT) is safe for Ms. Jones.

18 21. The communication is so awful that Ms. Jones is being forced to abandon family traditions  
19 that have lasted for 40 years. Over the last 40 years, Ms. Jones regularly contacted all of her  
20 children and grandchildren on every holiday and birthday every year. With this guardianship in  
21 place, those traditions have ceased or, even worse, Kim is outright rejecting or discouraging Ms.  
22 Jones from making that contact. Ms. Jones is not capable of keeping these traditions on her own.  
23 She needs help. She cannot operate her phone on her own. *See* Transcript of Petitioners' June 13,  
24  
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1 2020, Audio Recording of Ms. Jones wherein she confirms she does not know how to operate her  
2 phone attached as Exhibit B. She cannot coordinate visits on her own. Her desire to keep these  
3 traditions did not suddenly disappear. This is a prime example of where Kim should continue to  
4 facilitate communication for Ms. Jones to avoid isolation. Yet, as discussed in the Petition, Robyn  
5 struggled to schedule and talk to Ms. Jones on Halloween and Christmas. In fact, Robyn did not  
6 get a Christmas call. It is entirely disingenuous for LACSN and Kim to insist that Ms. Jones can  
7 handle these things on her own, or that suddenly she hates Robyn and Donna.

8 22. Kim previously agreed with this position. Kim previously emailed all of Ms. Jones' family  
9 at the beginning informing everyone that Ms. Jones loves phone calls. Now, Kim deprives Ms.  
10 Jones of what Kim knows Ms. Jones loves. The course correction is simple. Kim needs to assist  
11 Ms. Jones in dialing phone numbers for Ms. Jones regularly.

12 23. Petitioners wish to aid Ms. Jones with finances, money, groceries, and clothes. To do this,  
13 Petitioners need Kim to communicate to them what Ms. Jones needs. Petitioners have no idea if  
14 she needs help with bills, groceries, or clothing. At one point, Robyn was sending groceries on a  
15 regular basis to Ms. Jones, but Kim shut that down. At another time, Robyn tried to help Ms. Jones  
16 buy some clothes, but Kim made the experience a nightmare. Petitioners are not even sure if Ms.  
17 Jones needs help getting the Covid-19 vaccination. Petitioners ask Ms. Jones for updates, but Ms.  
18 Jones' answers are often not true because of her dementia. If Kim could not be bothered to inform  
19 Ms. Jones when her husband died, Petitioners do not believe Kim would be forthcoming with  
20 letting Petitioners know when Ms. Jones wants to visit.

21 22. Additionally, Petitioners reiterate that Petitioners are concerned what will happen if Kim  
23 moves Ms. Jones to California. Petitioners have not brought this Petition lightly. Petitioners have  
24 exhausted a year trying to make visits and communication happen without court intervention.  
25

1 Petitioners want to ensure that if Kim moves to California, then Petitioners will not be out in the  
2 cold completely and have to do this all over again in California. Accordingly, the Court's  
3 intervention is warranted to ensure that an appropriate system for "simple logistics" is in place  
4 even should Ms. Jones' residence change.

5 **C. The Oppositions Misconstrue and Misapply NRS Chapter 159 Behind a False**  
6 **Narrative**

7 25. Both oppositions contend that Petitioners are seeking to simplify their own lives at the  
8 expense of forcing Ms. Jones to do things she does not want to do. These arguments are meritless  
9 and ignore the multiple examples provided in the Petition. At issue in the Petition are three  
10 situations that Petitioners seek to correct: 1) situations where Ms. Jones expresses a desire to Robyn  
11 or Donna that she wants to visit either of them or their families, but then struggles and fails to  
12 actually plan and carry out the visit; 2) situations where Kim interferes, interrupts, stops, or  
13 precludes visits between Ms. Jones and Petitioners from occurring; and 3) Kim's last minute  
14 invitations to Petitioners to see their mother which deprives Ms. Jones of meaningful visits and  
15 forces Petitioners to literally drop everything at a moment's notice if they want to see Ms. Jones.  
16 Petitioners are in no way trying to force Ms. Jones to visit them when she does not want to – even  
17 though this is the only scenario that either opposition discusses.

18 26. To further confuse this Court, Kimberly includes a misleading list, on page 6 of Kimberly's  
19 Opposition regarding communication and visits with Donna, because many of the items listed  
20 coincide with when Kimberly knew she was under scrutiny following the September hearing when  
21 her reluctance and refusal to allow for visits with Robyn and Donna were brought to this Court's  
22 attention. In fact, Petitioners believe most of the relatively few instances of Kim randomly reaching  
23 out coincide with discussions between attorneys and Petitioners' complaints about the lack of visits  
24 and clear communication. Her list reinforces Petitioners' argument that she behaves better and  
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1 follows through with communication when the Court and attorneys are involved, but will return to  
2 wallowing in ignoring, undermining and interrupting once she is no longer under scrutiny.

3 27. The arguments in LACSN's Opposition under NRS 159.328(h) are misguided. Ms. Jones'  
4 preferences are not really known to this Court, just other persons' interpretation of them, and Ms.  
5 Jones does not have capacity to be fully in the driver's seat in this case. There is a guardianship  
6 for a reason, and it is not because Ms. Jones has the capacity to fully drive the vehicle. Ms. Jones  
7 has never communicated to either Robyn or Donna that she does not want to speak with them or  
8 that she does not want a Court order governing her communication with them, even though because  
9 of Kimberly's intransigence they ask their mother about this regularly. On the contrary, Ms. Jones  
10 has only ever expressed a desire to Petitioners that she wants to see and talk to them. It is extremely  
11 frustrating to Petitioners that they are constantly told by Ms. Parra-Sandoval and Mr. Beckstrom  
12 that what they are hearing directly from Ms. Jones is a lie and fabrication of their imagination, that  
13 Ms. Jones really does not want to see them, that Ms. Jones may even hate them for their actions in  
14 this case, and that their protests and evidence to the contrary should be silenced and labeled as  
15 selfish. For these reasons, it is incumbent upon the Court to use available tools to figure out which  
16 side of the coin is correct – to refuse to act would be an infringement on Ms. Jones' Bill of Rights  
17 guarantees.  
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19 28. The arguments in LACSN's Opposition under NRS 159.328(i) are also misguided. Under  
20 NRS 159.328(i), Ms. Jones has the right to be granted the greatest degree of freedom possible and  
21 exercise control of the aspects of her life that are not delegated to a guardian by a Court order.  
22 Unfortunately, as shown in the Petition, Ms. Jones cannot schedule and follow through with visits,  
23 so this aspect of her life must be delegated to Kimberly by Court Order. What the Oppositions fail  
24 to state is that the only successful visits and communication occurring between Ms. Jones and her  
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1 family comes from Kim's involvement. Kim's Opposition states that Donna has been getting  
2 recent visits and communication with Ms. Jones. The supporting text messages show that those  
3 visits and communications only occurred with Kim's condescending assistance. In short, Ms. Jones  
4 will never see or communicate with any of her family members unless Kim assists Ms. Jones in  
5 planning those visits even when Ms. Jones tells those other family members that she wants to visit.

6 29. Furthermore, the arguments in Kimberly's Opposition are overly specific and self-serving  
7 in claiming that Petitioners are making demands for schedules and requirements on Kimberly when  
8 Petitioners are simply letting the Court know what may work for all involved in these  
9 circumstances. These suggestions are basically methodologies the Court may order to get  
10 Kimberly to facilitate access and communication for Ms. Jones in like manner as she is apparently  
11 already providing for Teri Butler. If not a schedule, then there should be some "simple logistics"  
12 to ensure meaningful visits and communication between Ms. Jones and Petitioners.

13 30. Interestingly, the arguments in both LACSN's Opposition and Kim's Opposition are overly  
14 generalized in that they lack any specificity in responding to the detailed accounts of Kimberly's  
15 ignoring, undermining, and interrupting Robyn's and Donna's communication and visits with Ms.  
16 Jones shown in the Petition. Kim does not deny that she makes last minute changes to Ms. Jones'  
17 plans to deprive Kim's sisters of vacations and visits with June. Kim does not deny that Kim yelled  
18 Robyn and her family out of Ms. Jones' home. Kim does not allege that any of the specific  
19 examples in the Petition are false or did not happen. Likewise, LACSN's Opposition is devoid of  
20 any similar denials from Ms. Jones. This lack of response shows the accounts provided in the  
21 Petition are accurate, confirms Kimberly's tendency to isolate Ms. Jones from Robyn and from  
22 Donna particularly when Kimberly is not under scrutiny, and supports allegations that NRS  
23 200.5092(4) is being violated.  
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1 31. LACSN's self-serving approach to this case is most readily visible in LACSN's Opposition  
2 argument regarding the attorney fee appeal and the lien for fees. LACSN does not want this Court  
3 to canvass Ms. Jones or for Ms. Jones to have an FMC interview, which LACSN terms to be an  
4 "interrogation," because these are the very tools that would show this Court Ms. Jones' inability  
5 to follow through in scheduling and attending visits, and by extension, Ms. Jones' inability to  
6 direct her court-appointed counsel regarding an appeal. Petitioners firmly believe the push for the  
7 appeal came from LACSN's upper management, utilizing and manipulating Ms. Jones' diminished  
8 capacity for its own gain. In other words, LACSN is pushing its own political agenda at the expense  
9 of a mother getting quality time with her daughters – doing so regardless of what kind of false  
10 story it has to tell.

11 32. It is also important to note that the statements in LACSN's Opposition very conveniently  
12 leave out the fact that the judgment for attorney's fees this Court ordered are simply filed as a lien  
13 against the property in California, as requested of this Court and fully litigated. No proceeding was  
14 started in California to enforce the lien, and the lien will only be paid when the home is sold, and  
15 Ms. Jones is not in need of the proceeds, which makes the prospects of any recovery of Petitioners'  
16 fees highly unlikely. Again, the fact that all of this is left out of the Opposition likely indicates it  
17 was also left out of any explanation provided to Ms. Jones for her consideration and direction.

18 33. Accordingly, the Oppositions advocate for the Court to adhere to NRS 159 and protect Ms.  
19 Jones' guarantees under the Bill of Rights. Petitioners agree. NRS 159 should be followed. But  
20 LACSN and Kimberly misinterpret and misapply those statutes to tell a convenient story that  
21 ignores reality and the actual issues raised by Petitioners. Ms. Jones has diminished capacity and  
22 memory issues, and it is past time for LACSN and Kimberly to quit the charade that she somehow  
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1 has the ability to work a phone on her own – let alone plan, coordinate, schedule, and follow  
2 through with visits and communication without Kim’s – her guardian’s - assistance.

3 34. Any and all fees incurred in getting a fair Order in place to protect Ms. Jones’ right to  
4 communicate and visit with all her family are being incurred because of Kimberly’s ignoring,  
5 undermining and interrupting of Ms. Jones’ visits with Robyn and Donna as supported in this  
6 matter by the LACSN attorney. This Petition is preceded by literally a year of expensive and  
7 exhausting good faith meet and confer efforts that have been met with blatant ignoring of realities  
8 and pressing of false narratives that Ms. Jones can facilitate all these things without her guardian’s  
9 help and that Robyn and Donna are trying to shackle their mother. Kimberly and LACSN should  
10 be ordered to pay Robyn and Donna’s attorney’s fees for being forced to file this Petition.

11 35. It is literally shocking that Ms. Jones has been to visit her daughter Teri (who supports  
12 Kim) 10 times! We are asked by Kim and the LACSN attorney to believe these were all facilitated  
13 by Ms. Jones with no input or help from Kim.

14 36. This Court should consider asking the guardian to produce phone and text logs to confirm  
15 how many times she contacts Teri versus Robyn or Donna. Petitioners hereby submit records  
16 attached hereto as Exhibit \*\*\* to further demonstrate the almost complete lack of communication  
17 between the guardian and Robyn and between Robyn and June. Most of the calls are Robyn  
18 attempting to contact June and getting no answer or after being greeted by Ms. Jones, having Ms.  
19 Jones say suddenly that she has to hang up and asking Robyn to call later. There were more  
20 contacts before June 2020 and then almost nothing from Kim. The calls with June are all two  
21 minutes or less the entire time. Many of the one-minute calls with Kim or June from Robyn were  
22 no answer with the call just going to voicemail. There was one call with Kim in June for one  
23 minute. Two calls in July. None in August. Three in September for a total of five minutes. Since  
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1 Kim has been guardian, contact between Ms. Jones and her daughters Robyn and Donna has  
2 declined to almost nothing.

3 37. Petitioners respectfully plead for the Court to canvas Ms. Jones for itself to determine her  
4 understanding as is done with many other protected persons in various guardianship hearings.

5 38. Further, petitioners request that they be allowed to submit *in camera* a list of questions that  
6 could help the Court better understand Ms. Jones' lack of capacity and understanding of her  
7 situation. Indeed, Ms. Jones' LACSN attorney has stated repeatedly in these proceedings that she  
8 has to remind Ms. Jones every time it comes up that her home was taken by her husband's son-in-  
9 law. Petitioners are concerned that if these simple questions were provided to the guardian or Ms.  
10 Jones' LACSN attorney, Ms. Jones would be coached in her answers to protect the interests and  
11 arguments of LACSN and the guardian. For example, the LACSN attorney has a vested interest  
12 in showing her client understands that she has initiated an extremely expensive appeal of a fee  
13 award specially designed to not impact Ms. Jones during her life. Petitioners opted for a lien  
14 against a property and advised everyone they would cooperate in selling that property and allowing  
15 the proceeds to be used to benefit Ms. Jones during her life. Specifically, petitioners agreed they  
16 might receive nothing due to the property and other assets of Ms. Jones being entirely used for her  
17 welfare.  
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19 39. To confirm, petitioners believe Ms. Jones is able to form an opinion in a given moment.  
20 However, those opinions are rarely coupled with sequential logic. Meaning that they lack the depth  
21 and breadth needed to logically form an opinion that has merit beyond the words repeated or  
22 chosen - for that moment. How can Ms. Jones form an opinion about how and when to see Robyn  
23 or Donna when she is likely unable to give an accurate answer as to how long ago she last saw  
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1 Robyn or Donna? Since the LACSN attorney is unable or unwilling to see this and help, and the  
2 guardian will not help, petitioners plead for the Court's intervention.

3 **WHEREFORE**, Petitioners pray:

4 1. The Court grant the relief requested in Petitioners' Verified Petition for Communication,  
5 Visits, and Vacation Time with Protected Person including the implementation of Talking Parents,  
6 a program designed for families who can't otherwise agree on visitation and communication, and  
7 ordering an independent interview of Ms. Jones by the trained professionals at the Family  
8 Mediation Center;

9 2. The Court denies the relief requested in the Kimberly's Opposition to Verified Petition for  
10 Communication, Visits, and Vacation Time with Protected Person – including the request for  
11 attorney's fees;

12 3. The Court denies the relief requested in Kathleen June Jones' Opposition to Verified  
13 Petition for Communication, Visits, and Vacation Time with Protected Person;

14 4. The Court order LACSN and Kimberly to pay the attorneys fees and costs of petitioners in  
15 bringing this Petition;

16 5. The Court canvas Ms. Jones to enable the Court to obtain its own impressions of her  
17 capacity; and

18 6. The Court allow a list of questions to be submitted in camera by petitioners from which the  
19 Court could select questions to ask Ms. Jones to determine if she really can handle her affairs as  
20 argued by the guardian and LACSN and allow an opportunity for such questioning where neither  
21 the LACSN attorney nor the guardian nor the guardian's attorney can coach or groom Ms. Jones  
22 in her answers.

23 ///  
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1 7. The Court order such other and further relief as it deems appropriate.

2 DATED: February 1, 2021.

3 MICHAELSON & ASSOCIATES, LTD.

4 /s/ John P. Michaelson  
5 John P. Michaelson, Esq.  
6 Nevada Bar No. 7822  
7 Ammon E. Francom, Esq.  
8 Nevada Bar No. 14196  
9 2200 Paseo Verde Parkway, Ste. 160  
10 Henderson, Nevada 89052  
11 Counsel for Petitioners  
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**CERTIFICATE OF SERVICE**

Pursuant to NEFCR 9, the undersigned hereby certifies a copy of the PETITIONERS' OMNIBUS REPLY TO: KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON; AND KATHLEEN JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON was served on the following individual on February 1, 2021, to the following individuals:

Geraldine Tomich, Esq. <a href="mailto:gtomich@maclaw.com">gtomich@maclaw.com</a>  James Beckstrom, Esq. <a href="mailto:jbeckstrom@maclaw.com">jbeckstrom@maclaw.com</a>  Cheryl Becnel <a href="mailto:cbecnel@maclaw.com">cbecnel@maclaw.com</a>  <i>Attorneys for Kimberly Jones</i>	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada <a href="mailto:mparra@lacsns.org">mparra@lacsns.org</a>  Alexa Reanos <a href="mailto:areanos@lacsns.org">areanos@lacsns.org</a>
Jeffrey R. Sylvester <a href="mailto:jeff@sylvesterpolednak.com">jeff@sylvesterpolednak.com</a>  Kelly L. Easton <a href="mailto:kellye@sylvesterpolednak.com">kellye@sylvesterpolednak.com</a>  Co-Counsel for Petitioners, Robyn Friedman and Donna Simmons	Kate McCloskey <a href="mailto:NVGCO@nvcourts.nv.gov">NVGCO@nvcourts.nv.gov</a>  LaChasity Carroll <a href="mailto:lcarrol@nvcourts.nv.gov">lcarrol@nvcourts.nv.gov</a>  Sonja Jones <a href="mailto:sjones@nvcourts.nv.gov">sjones@nvcourts.nv.gov</a>

Pursuant to NRCP 5, the undersigned hereby certifies a copy of the PETITIONERS' OMNIBUS REPLY TO: KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON; AND KATHLEEN JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON was

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1 mailed by US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada on the  
2 following individual on February 2, 2021, to the following individuals and/or entities at the  
3 following addresses:

4 Jen Adamo 14 Edgewater Drive 5 Magnolia, DE 19962	Teri Butler 586 N. Magdalena Street Dewey, AZ 86327
6 Courtney Simmons 765 Kimbark Avenue 7 San Bernardino, CA 92407	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
8 Ampersand Man 2824 High Sail Court 9 Las Vegas, Nevada 89117	Tiffany O'Neal 177 N. Singingwood Street, Unit 13 Orange, CA 92869

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11 MICHAELSON & ASSOCIATES, LTD.

12 /s/ Lenda Murnane  
13 Employee of Michaelson & Associates  
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## EXHIBIT A

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## EXHIBIT B

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## Robyn Friedman's June 13, 2020 Audio Recording of June Jones Outside the Kraft House

**Robyn Friedman:** Well, Mom.

**June Jones:** We can't get in?

**Robyn Friedman:** Doesn't sound like it. There's no one there. And you don't have keys, right? No?

**Robyn Friedman:** So sit down. Let Grandma sit down baby. No, that's Grandma's seat. So what do we do? Here, call Kim, Mom.

**June Jones:** Can we go around the back?

**Robyn Friedman:** I - I don't - I can't climb over that fence but here, let me give you your phone and you can call Kim.

**Robyn Friedman:** Here's your phone, go ahead and call Kim.

**June Jones:** (mumbled) How do I call her?

**Robyn Friedman:** What?

**June Jones:** How do I call her?

**Robyn Friedman:** Do you know how to use your phone?

**June Jones:** No.

**Robyn Friedman:** You don't know how to use your phone, Mom?

**June Jones:** No. How do I call her?

**Robyn Friedman:** Okay. So that green one right there. And then, let's put...type K-I-M, okay...“Kim Daughter”, right there. Oh that's “Kimberly Daughter”. Yeah, push that one and see what happens. I don't think that's her right one. Try the other one that says “Kim”, the second one up.

**June Jones:** Where, here?

**Robyn Friedman:** Yeah. Try that one and see what happens.

**June Jones:** (mumbled) What do I hit?

**Robyn Friedman:** What?

**June Jones:** What do I hit?



**Robyn Friedman:** See where it says “phone”? Right there. Okay, put it up to your ear so you can hear.

**End of Recording**



**ROPP**

John P. Michaelson, Esq.  
Nevada Bar No. 7822  
Email: [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)  
Ammon E. Francom, Esq.  
Nevada Bar No. 14196  
Email: [ammon@michaelsonlaw.com](mailto:ammon@michaelsonlaw.com)  
MICHAELSON & ASSOCIATES, LTD.  
2200 Paseo Verde Parkway, Ste. 160  
Henderson, Nevada 89052  
Ph: (702) 731-2333  
Fax: (702) 731-2337  
Counsel for Robyn Friedman and Donna Simmons

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )

Kathleen June Jones, )

An Adult Protected Person. )

Case Number: G-19-052263-A

Department: B

Date of Hearing: February 11, 2021

Time of Hearing: 9:30 a.m.

**SUPPLEMENT TO PETITIONERS' OMNIBUS REPLY TO:**

**(1) KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR  
COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON:**

**AND**

**(2) KATHLEEN JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR  
COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON**

☐ TEMPORARY GUARDIANSHIP

☐ Person

☐ Estate ☐ Summary Admin.

☐ Person and Estate

☒ GENERAL GUARDIANSHIP

☐ Person

☐ Estate ☐ Summary Admin.

☒ Person and Estate

☐ SPECIAL GUARDIANSHIP

☐ Person

☐ Estate ☐ Summary Admin.

☐ Person and Estate

☐ NOTICES / SAFEGUARDS

☐ Blocked Account

☐ Bond Posted

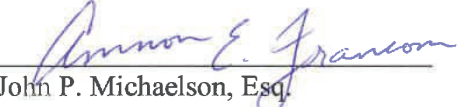
☐ Public Guardian Bond

COMES NOW Robyn Friedman and Donna Simmons ("Petitioners" or "Robyn" and  
"Donna"), as family members and interested parties in this matter, by and through the law firm,

1 Michaelson & Associates, Ltd., who hereby submits to this Honorable Court their Supplement to  
2 Omnibus Reply to: (1) Kimberly Jones' Opposition to Verified Petition for Communication,  
3 Visits, and Vacation Time with Protected Person ("Kim's Opposition"); and (2) Kathleen June  
4 Jones' Opposition to Verified Petition for Communication, Visits, and Vacation Time with  
5 Protected Person (LACSN's Opposition"), by attaching hereto Exhibit A, Exhibits C<sup>1</sup> and D and  
6 the Verification signed by Donna Simmons which were not included with their original Omnibus  
7 Reply.

8 DATED: February 3, 2021.

9 MICHAELSON & ASSOCIATES, LTD.

10   
11 John P. Michaelson, Esq.  
12 Nevada Bar No. 7822  
13 Ammon E. Francom, Esq.  
14 Nevada Bar No. 14196  
15 2200 Paseo Verde Parkway, Ste. 160  
16 Henderson, Nevada 89052  
17 Counsel for Petitioners  
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25 <sup>1</sup> Exhibits C and D are summaries of the phone logs to confirm how little communication can be  
had calling Mr. Jones directly, and how much Robyn has attempted to communicate with June  
and Kimberly.

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DONNA SIMMONS

**CERTIFICATE OF SERVICE**

Pursuant to NEFCR 9, the undersigned hereby certifies a copy of the SUPPLEMENT TO PETITIONERS' OMNIBUS REPLY TO: KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON; AND KATHLEEN JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON was served on the following individual on February 3, 2021, to the following individuals:

Geraldine Tomich, Esq. gtomich@maclaw.com	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada mparra@lacsns.org
James Beckstrom, Esq. jbeckstrom@maclaw.com	Alexa Reanos areanos@lacsns.org
Cheryl Becnel cbecnel@maclaw.com	
<i>Attorneys for Kimberly Jones</i>	
Jeffrey R. Sylvester jeff@sylvesterpolednak.com	Kate McCloskey NVGCO@nvcourts.nv.gov
Kelly L. Easton kellye@sylvesterpolednak.com	LaChasity Carroll lcarrol@nvcourts.nv.gov
Co-Counsel for Petitioners, Robyn Friedman and Donna Simmons	Sonja Jones sjones@nvcourts.nv.gov

Pursuant to NRCP 5, the undersigned hereby certifies a copy of the SUPPLEMENT TO PETITIONERS' OMNIBUS REPLY TO: KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON; AND KATHLEEN JUNE JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON was  
///

1 mailed by US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada on the  
2 following individual on February 3, 2021, to the following individuals and/or entities at the  
3 following addresses:  
4

5 Jen Adamo 14 Edgewater Drive 6 Magnolia, DE 19962	Teri Butler 586 N. Magdalena Street Dewey, AZ 86327
7 Courtney Simmons 765 Kimbark Avenue 8 San Bernardino, CA 92407	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
9 Ampersand Man 2824 High Sail Court 10 Las Vegas, Nevada 89117	Tiffany O'Neal 177 N. Singingwood Street, Unit 13 Orange, CA 92869

11  
12 MICHAELSON & ASSOCIATES, LTD.

13 /s/ Lenda Murnane

14 Employee of Michaelson & Associates  
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## EXHIBIT A













## EXHIBIT C

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## Calls with June

09/03/2020 07:13PM	702.553.6060	Las Vegas, NV	SDDV	2	0.00
09/07/2020 07:19PM	702.553.6060	Las Vegas, NV	WIFI	1	0.00
09/17/2020 08:53AM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
09/28/2020 01:09PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		4 calls	5 minutes \$0.00
08/04/2020 08:45PM	702.553.6060	Las Vegas, NV	SDDV	2	0.00
08/11/2020 12:17PM	702.553.6060	Las Vegas, NV	WIFI	2	0.00
08/26/2020 06:21PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		3 calls	5 minutes \$0.00
07/08/2020 10:24AM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
07/11/2020 10:27AM	702.553.6060	Las Vegas, NV	WIFI	1	0.00
07/11/2020 10:27AM	702.553.6060	Las Vegas, NV	WIFI	2	0.00
07/15/2020 12:06PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		4 calls	5 minutes \$0.00
06/10/2020 12:32PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
06/24/2020 09:18AM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
06/27/2020 12:45PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		3 calls	3 minutes \$0.00
05/29/2020 06:05PM	702.553.6060	Las Vegas, NV	WIFI	2	0.00
		Total for 702-553-6060		1 calls	2 minutes \$0.00
01/01/2020 03:18PM	702.553.6060	Las Vegas, NV	WIFI	1	0.00
		Total for 702-553-6060		1 calls	1 minutes \$0.00
11/28/2019 05:30PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		1 calls	1 minutes \$0.00

## EXHIBIT D

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## Calls with June or Kim

09/03/2020 07:13PM	702.553.6060	Las Vegas, NV	SDDV	2	0.00
09/07/2020 07:19PM	702.553.6060	Las Vegas, NV	WIFI	1	0.00
09/17/2020 08:53AM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
09/28/2020 01:09PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		4 calls	5 minutes \$0.00
09/18/2020 06:20PM	714.336.8071	Incoming, CL	WIFI	3	0.00
09/18/2020 06:24PM	714.336.8071	Incoming, CL	WIFI	1	0.00
09/18/2020 07:37PM	714.336.8071	Incoming, CL	WIFI	1	0.00
		Total for 714-336-8071		3 calls	5 minutes \$0.00
08/04/2020 08:45PM	702.553.6060	Las Vegas, NV	SDDV	2	0.00
08/11/2020 12:17PM	702.553.6060	Las Vegas, NV	WIFI	2	0.00
08/26/2020 06:21PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		3 calls	5 minutes \$0.00
07/08/2020 10:24AM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
07/11/2020 10:27AM	702.553.6060	Las Vegas, NV	WIFI	1	0.00
07/11/2020 10:27AM	702.553.6060	Las Vegas, NV	WIFI	2	0.00
07/15/2020 12:06PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		4 calls	5 minutes \$0.00
07/08/2020 10:26AM	714.336.8071	Incoming, CL	SDDV	2	0.00
07/10/2020 06:25PM	714.336.8071	Incoming, CL	WIFI	10	0.00
		Total for 714-336-8071		12	
				2 calls	minutes \$0.00
06/10/2020 12:32PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
06/24/2020 09:18AM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
06/27/2020 12:45PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060		3 calls	3 minutes \$0.00
06/24/2020 02:40PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
		Total for 714-336-8071		1 calls	1 minutes \$0.00
05/29/2020 06:05PM	702.553.6060	Las Vegas, NV	WIFI	2	0.00
		Total for 702-553-6060		1 calls	2 minutes \$0.00

05/10/2020 12:02PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
05/10/2020 12:04PM	714.336.8071	Incoming, CL	SDDV	1	0.00
05/10/2020 01:46PM	714.336.8071	Incoming, CL	WIFI	1	0.00
05/14/2020 05:29PM	714.336.8071	Anaheim, CA	WIFI	15	0.00
05/14/2020 05:45PM	714.336.8071	Anaheim, CA	WIFI	5	0.00
05/18/2020 01:29PM	714.336.8071	Incoming, CL	SDDV	1	0.00
05/18/2020 01:30PM	714.336.8071	Anaheim, CA	SDDV	3	0.00
05/31/2020 07:34PM	714.336.8071	Anaheim, CA	SDDV	5	0.00
		Total for 714-336-8071	8 calls	32 minutes	\$0.00
04/03/2020 11:17AM	714.336.8071	Anaheim, CA	SDDV	13	0.00
04/04/2020 03:21PM	714.336.8071	Incoming, CL	SDDV	4	0.00
04/04/2020 03:25PM	714.336.8071	Incoming, CL	SDDV	6	0.00
04/04/2020 03:35PM	714.336.8071	Anaheim, CA	SDDV	3	0.00
04/06/2020 07:28PM	714.336.8071	Incoming, CL	WIFI	26	0.00
04/09/2020 06:51PM	714.336.8071	Incoming, CL	WIFI	3	0.00
04/09/2020 06:56PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
04/10/2020 02:19PM	714.336.8071	Anaheim, CA	SDDV	2	0.00
04/10/2020 04:34PM	714.336.8071	Incoming, CL	SDDV	2	0.00
04/11/2020 02:27PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
04/11/2020 02:30PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
04/11/2020 02:35PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
04/12/2020 04:13PM	714.336.8071	Incoming, CL	SDDV	2	0.00
		Total for 714-336-8071	13 calls	65 minutes	\$0.00
03/03/2020 04:03PM	714.336.8071	Anaheim, CA	SDDV	6	0.00
03/03/2020 04:08PM	714.336.8071	Anaheim, CA	SDDV	4	0.00
03/05/2020 06:51PM	714.336.8071	Incoming, CL	SDDV	3	0.00
03/07/2020 04:32PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
		Total for 714-336-8071	4 calls	14 minutes	\$0.00
03/08/2020 12:30PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
03/08/2020 12:30PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
03/08/2020 12:38PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
03/10/2020 01:44PM	714.336.8071	Anaheim, CA	SDDV	2	0.00
03/11/2020 06:07PM	714.336.8071	Incoming, CL	WIFI	3	0.00
03/15/2020 03:38PM	714.336.8071	Anaheim, CA	WIFI	6	0.00
03/16/2020 07:21AM	714.336.8071	Anaheim, CA	SDDV	2	0.00
03/16/2020 08:23AM	714.336.8071	Anaheim, CA	SDDV	2	0.00
03/16/2020 08:35AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
03/16/2020 08:45AM	714.336.8071	Anaheim, CA	SDDV	3	0.00
03/16/2020 08:53AM	714.336.8071	Anaheim, CA	SDDV	2	0.00
03/16/2020 09:00AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
03/16/2020 09:21AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
03/16/2020 09:29AM	714.336.8071	Incoming, CL	SDDV	2	0.00
03/16/2020 01:23PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
03/18/2020 06:57PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
03/18/2020 07:06PM	714.336.8071	Incoming, CL	WIFI	3	0.00
03/18/2020 07:09PM	714.336.8071	Incoming, CL	WIFI	3	0.00

03/24/2020 03:23PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
03/25/2020 01:01PM	714.336.8071	Incoming, CL	SDDV	1	0.00
03/27/2020 04:33PM	714.336.8071	Anaheim, CA	WIFI	6	0.00
03/30/2020 08:21PM	714.336.8071	Anaheim, CA	SDDV	16	0.00
Total for 714-336-8071				60	
				22 calls	minutes \$0.00
02/03/2020 11:37AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
02/03/2020 11:37AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
02/04/2020 05:03PM	714.336.8071	Incoming, CL	SDDV	3	0.00
02/04/2020 05:08PM	714.336.8071	Incoming, CL	SDDV	2	0.00
02/04/2020 05:10PM	714.336.8071	Incoming, CL	SDDV	4	0.00
02/05/2020 12:35PM	714.336.8071	Anaheim, CA	SDDV	9	0.00
02/05/2020 12:56PM	714.336.8071	Anaheim, CA	SDDV	6	0.00
02/05/2020 01:08PM	714.336.8071	Anaheim, CA	SDDV	3	0.00
02/05/2020 02:06PM	714.336.8071	Call Wait	SDDV	18	0.00
02/05/2020 03:53PM	714.336.8071	Anaheim, CA	SDDV	12	0.00
02/05/2020 04:38PM	714.336.8071	Incoming, CL	SDDV	1	0.00
02/05/2020 04:40PM	714.336.8071	Incoming, CL	SDDV	1	0.00
02/05/2020 04:40PM	714.336.8071	Call Wait	SDDV	1	0.00
02/05/2020 04:41PM	714.336.8071	Anaheim, CA	SDDV	8	0.00
02/05/2020 06:04PM	714.336.8071	Anaheim, CA	WIFI	12	0.00
02/05/2020 09:36PM	714.336.8071	Incoming, CL	SDDV	14	0.00
02/06/2020 12:23PM	714.336.8071	Anaheim, CA	SDDV	4	0.00
02/06/2020 06:31PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
02/06/2020 06:39PM	714.336.8071	Incoming, CL	SDDV	13	0.00
02/06/2020 06:52PM	714.336.8071	Anaheim, CA	SDDV	3	0.00
02/06/2020 07:38PM	714.336.8071	Anaheim, CA	SDDV	3	0.00
02/06/2020 07:52PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
02/06/2020 07:59PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
02/08/2020 05:15PM	714.336.8071	Anaheim, CA	SDDV	2	0.00
02/09/2020 11:30AM	714.336.8071	Anaheim, CA	WIFI	1	0.00
02/09/2020 12:02PM	714.336.8071	Incoming, CL	WIFI	2	0.00
02/10/2020 12:08AM	714.336.8071	Anaheim, CA	WIFI	1	0.00
02/10/2020 12:08AM	714.336.8071	Anaheim, CA	WIFI	1	0.00
02/10/2020 12:09AM	714.336.8071	Anaheim, CA	WIFI	1	0.00
02/10/2020 12:19PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
Total for 714-336-8071				131	
				30 calls	minutes \$0.00
01/06/2020 11:15AM	714.336.8071	Incoming, CL	SDDV	14	0.00
01/06/2020 12:24PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/06/2020 12:41PM	714.336.8071	Call Wait	SDDV	1	0.00
01/06/2020 05:30PM	714.336.8071	Call Wait	WIFI	5	0.00
01/06/2020 07:42PM	714.336.8071	Incoming, CL	SDDV	3	0.00
01/06/2020 08:02PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/06/2020 08:32PM	714.336.8071	Incoming, CL	SDDV	1	0.00
01/06/2020 08:33PM	714.336.8071	Anaheim, CA	SDDV	2	0.00
01/06/2020 08:40PM	714.336.8071	Incoming, CL	SDDV	7	0.00
01/07/2020 11:26AM	714.336.8071	Incoming, CL	WIFI	1	0.00
01/08/2020 06:07PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
01/09/2020 01:57PM	714.336.8071	Incoming, CL	SDDV	11	0.00
01/09/2020 02:10PM	714.336.8071	Anaheim, CA	SDDV	2	0.00



01/09/2020 02:12PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/09/2020 02:12PM	714.336.8071	Anaheim, CA	SDDV	5	0.00
01/09/2020 02:17PM	714.336.8071	Incoming, CL	SDDV	4	0.00
01/11/2020 10:47AM	714.336.8071	Incoming, CL	SDDV	2	0.00
01/11/2020 04:22PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/13/2020 08:18PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
01/13/2020 08:19PM	714.336.8071	Incoming, CL	WIFI	1	0.00
01/14/2020 02:31PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/14/2020 02:33PM	714.336.8071	Call Wait	SDDV	11	0.00
01/14/2020 02:57PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/15/2020 08:24AM	714.336.8071	Incoming, CL	SDDV	7	0.00
01/15/2020 08:49AM	714.336.8071	Anaheim, CA	SDDV	2	0.00
01/15/2020 08:57AM	714.336.8071	Anaheim, CA	SDDV	13	0.00
01/15/2020 09:49AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/15/2020 09:55AM	714.336.8071	Incoming, CL	SDDV	2	0.00
01/15/2020 10:49AM	714.336.8071	Anaheim, CA	SDDV	3	0.00
01/15/2020 10:58AM	714.336.8071	Incoming, CL	SDDV	2	0.00
01/15/2020 11:27AM	714.336.8071	Anaheim, CA	SDDV	5	0.00
01/15/2020 11:47AM	714.336.8071	Anaheim, CA	SDDV	10	0.00
01/16/2020 11:39AM	714.336.8071	Call Wait	SDDV	1	0.00
01/18/2020 12:18PM	714.336.8071	Incoming, CL	SDDV	2	0.00
01/18/2020 02:49PM	714.336.8071	Anaheim, CA	WIFI	6	0.00
01/18/2020 03:10PM	714.336.8071	Anaheim, CA	WIFI	10	0.00
01/18/2020 03:20PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
01/18/2020 03:20PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
01/18/2020 03:24PM	714.336.8071	Incoming, CL	WIFI	10	0.00
01/19/2020 12:07PM	714.336.8071	Incoming, CL	SDDV	2	0.00
01/19/2020 12:10PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/19/2020 03:43PM	714.336.8071	Anaheim, CA	WIFI	3	0.00
01/19/2020 03:50PM	714.336.8071	Incoming, CL	WIFI	13	0.00
01/19/2020 09:02PM	714.336.8071	Anaheim, CA	SDDV	4	0.00
01/20/2020 11:24AM	714.336.8071	Incoming, CL	SDDV	29	0.00
01/20/2020 12:41PM	714.336.8071	Anaheim, CA	WIFI	3	0.00
01/20/2020 01:00PM	714.336.8071	Incoming, CL	WIFI	4	0.00
01/20/2020 02:26PM	714.336.8071	Anaheim, CA	WIFI	5	0.00
01/20/2020 02:31PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
01/20/2020 02:32PM	714.336.8071	Call Wait	WIFI	9	0.00
Total for 714-336-8071			50 calls	228 minutes	\$0.00

01/21/2020 11:29AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/21/2020 03:46PM	714.336.8071	Incoming, CL	SDDV	1	0.00
01/22/2020 11:55AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/22/2020 12:07PM	714.336.8071	Anaheim, CA	SDDV	58	0.00
01/22/2020 06:54PM	714.336.8071	Incoming, CL	SDDV	30	0.00
01/23/2020 12:01PM	714.336.8071	Incoming, CL	SDDV	2	0.00
01/23/2020 12:13PM	714.336.8071	Anaheim, CA	SDDV	2	0.00
01/23/2020 12:54PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/23/2020 12:55PM	714.336.8071	Anaheim, CA	SDDV	2	0.00
01/23/2020 01:04PM	714.336.8071	Incoming, CL	SDDV	1	0.00
01/23/2020 01:19PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/23/2020 02:34PM	714.336.8071	Anaheim, CA	SDDV	2	0.00

01/23/2020 04:00PM	714.336.8071	Incoming, CL	SDDV	1	0.00
01/23/2020 04:03PM	714.336.8071	Incoming, CL	SDDV	1	0.00
01/23/2020 04:29PM	714.336.8071	Incoming, CL	SDDV	1	0.00
01/23/2020 04:54PM	714.336.8071	Anaheim, CA	WIFI	2	0.00
01/23/2020 07:25PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
01/23/2020 08:08PM	714.336.8071	Anaheim, CA	WIFI	4	0.00
01/24/2020 04:21PM	714.336.8071	Anaheim, CA	SDDV	3	0.00
01/25/2020 10:12AM	714.336.8071	Incoming, CL	SDDV	5	0.00
01/25/2020 01:45PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/25/2020 01:54PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
01/25/2020 06:18PM	714.336.8071	Incoming, CL	SDDV	33	0.00
01/26/2020 05:04PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
02/01/2020 02:04PM	714.336.8071	Anaheim, CA	WIFI	25	0.00
02/01/2020 02:59PM	714.336.8071	Anaheim, CA	SDDV	4	0.00
		Total for 714-336-8071		185	
			26 calls	minutes	\$0.00
01/01/2020 03:18PM	702.553.6060	Las Vegas, NV	WIFI	1	0.00
		Total for 702-553-6060			
			1 calls	1 minutes	\$0.00
12/04/2019 01:15PM	714.336.8071	Incoming, CL	SDDV	7	0.00
12/04/2019 01:25PM	714.336.8071	Anaheim, CA	WIFI	5	0.00
12/04/2019 02:44PM	714.336.8071	Anaheim, CA	WIFI	4	0.00
12/04/2019 03:12PM	714.336.8071	Incoming, CL	WIFI	5	0.00
12/06/2019 10:55AM	714.336.8071	Incoming, CL	SDDV	1	0.00
12/07/2019 12:17AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/07/2019 08:18AM	714.336.8071	Anaheim, CA	SDDV	9	0.00
12/08/2019 11:47AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/08/2019 08:55PM	714.336.8071	Anaheim, CA	WIFI	7	0.00
12/08/2019 09:08PM	714.336.8071	Anaheim, CA	SDDV	4	0.00
12/11/2019 02:32PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/11/2019 05:19PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/14/2019 10:00AM	714.336.8071	Incoming, CL	SDDV	2	0.00
12/14/2019 10:42AM	714.336.8071	Anaheim, CA	SDDV	3	0.00
12/14/2019 10:44AM	714.336.8071	Anaheim, CA	SDDV	10	0.00
12/14/2019 10:54AM	714.336.8071	Anaheim, CA	SDDV	2	0.00
12/14/2019 10:56AM	714.336.8071	Incoming, CL	SDDV	1	0.00
12/14/2019 11:01AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/14/2019 11:02AM	714.336.8071	Anaheim, CA	SDDV	2	0.00
12/14/2019 11:57AM	714.336.8071	Incoming, CL	SDDV	1	0.00
12/14/2019 04:28PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/16/2019 04:57PM	714.336.8071	Incoming, CL	WIFI	3	0.00
12/16/2019 05:40PM	714.336.8071	Incoming, CL	WIFI	1	0.00
12/17/2019 06:21PM	714.336.8071	Incoming, CL	SDDV	1	0.00
12/17/2019 06:25PM	714.336.8071	Incoming, CL	SDDV	8	0.00
12/18/2019 02:19PM	714.336.8071	Anaheim, CA	SDDV	5	0.00
12/18/2019 06:26PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/18/2019 07:35PM	714.336.8071	Anaheim, CA	SDDV	2	0.00
12/20/2019 06:12PM	714.336.8071	Incoming, CL	SDDV	1	0.00
12/21/2019 04:09PM	714.336.8071	Incoming, CL	SDDV	1	0.00
12/23/2019 02:19PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
12/23/2019 02:21PM	714.336.8071	Incoming, CL	WIFI	1	0.00

12/23/2019 02:32PM	714.336.8071	Incoming, CL	WIFI	1	0.00
12/24/2019 07:33PM	714.336.8071	Anaheim, CA	WIFI	3	0.00
12/25/2019 12:36PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
12/25/2019 01:01PM	714.336.8071	Incoming, CL	WIFI	1	0.00
12/25/2019 02:30PM	714.336.8071	Incoming, CL	WIFI	2	0.00
12/27/2019 02:10PM	714.336.8071	Incoming, CL	WIFI	1	0.00
		Total for 714-336-8071	38 calls	103 minutes	\$0.00
12/28/2019 04:37PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
12/28/2019 05:14PM	714.336.8071	Incoming, CL	SDDV	3	0.00
12/29/2019 03:32PM	714.336.8071	Incoming, CL	WIFI	1	0.00
12/29/2019 03:37PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
12/29/2019 03:40PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
12/29/2019 03:52PM	714.336.8071	Incoming, CL	WIFI	3	0.00
12/29/2019 04:10PM	714.336.8071	Anaheim, CA	WIFI	9	0.00
12/30/2019 04:10PM	714.336.8071	Incoming, CL	WIFI	4	0.00
12/31/2019 02:37PM	714.336.8071	Incoming, CL	SDDV	14	0.00
01/01/2020 03:19PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
		Total for 714-336-8071	10 calls	38 minutes	\$0.00
11/28/2019 05:30PM	702.553.6060	Las Vegas, NV	SDDV	1	0.00
		Total for 702-553-6060	1 calls	1 minutes	\$0.00
11/12/2019 05:03PM	714.336.8071	Anaheim, CA	SDDV	36	0.00
11/12/2019 05:39PM	714.336.8071	Incoming, CL	SDDV	1	0.00
11/13/2019 03:10PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/14/2019 10:47AM	714.336.8071	Incoming, CL	SDDV	3	0.00
11/14/2019 10:53AM	714.336.8071	Anaheim, CA	SDDV	20	0.00
11/14/2019 12:58PM	714.336.8071	Anaheim, CA	WIFI	6	0.00
11/14/2019 01:48PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
11/14/2019 01:54PM	714.336.8071	Anaheim, CA	WIFI	1	0.00
11/14/2019 02:03PM	714.336.8071	Incoming, CL	WIFI	1	0.00
11/14/2019 02:18PM	714.336.8071	Incoming, CL	WIFI	5	0.00
11/16/2019 04:04PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
		Total for 714-336-8071	11 calls	76 minutes	\$0.00
11/16/2019 04:11PM	714.336.8071	Anaheim, CA	SDDV	3	0.00
11/18/2019 11:04AM	714.336.8071	Incoming, CL	SDDV	1	0.00
11/18/2019 11:09AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/18/2019 11:19AM	714.336.8071	Incoming, CL	WIFI	1	0.00
11/18/2019 01:00PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/18/2019 01:01PM	714.336.8071	Incoming, CL	SDDV	1	0.00
11/18/2019 05:19PM	714.336.8071	Anaheim, CA	SDDV	4	0.00
11/19/2019 03:36PM	714.336.8071	Anaheim, CA	SDDV	5	0.00
11/20/2019 06:00PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/20/2019 06:36PM	714.336.8071	Incoming, CL	SDDV	10	0.00

11/20/2019 06:53PM	714.336.8071	Incoming, CL	SDDV	5	0.00
11/21/2019 06:08PM	714.336.8071	Anaheim, CA	SDDV	5	0.00
11/22/2019 05:08PM	714.336.8071	Incoming, CL	WIFI	6	0.00
11/22/2019 06:16PM	714.336.8071	Incoming, CL	WIFI	1	0.00
11/25/2019 04:35PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/27/2019 10:02AM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/27/2019 08:26PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/27/2019 08:27PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/27/2019 08:28PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/27/2019 08:29PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
11/27/2019 08:29PM	714.336.8071	Incoming, CL	SDDV	7	0.00
11/27/2019 08:43PM	714.336.8071	Incoming, CL	WIFI	1	0.00
Total for 714-336-8071				59 22 calls minutes	\$0.00
10/03/2019 03:10PM	714.336.8071	Incoming, CL	WIFI	2	0.00
10/13/2019 10:53AM	714.336.8071	Incoming, CL	SDDV	3	0.00
10/16/2019 05:52PM	714.336.8071	Incoming, CL	WIFI	1	0.00
10/18/2019 01:55PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
10/18/2019 01:57PM	714.336.8071	Incoming, CL	SDDV	2	0.00
10/18/2019 01:59PM	714.336.8071	Incoming, CL	SDDV	1	0.00
10/18/2019 02:03PM	714.336.8071	Anaheim, CA	SDDV	1	0.00
10/21/2019 03:40PM	714.336.8071	Incoming, CL	WIFI	8	0.00
10/21/2019 03:52PM	714.336.8071	Anaheim, CA	WIFI	3	0.00
10/29/2019 03:05PM	714.336.8071	Incoming, CL	SDDV	2	0.00
Total for 714-336-8071				24 10 calls minutes	\$0.00



**EXPP**

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**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )

Kathleen June Jones, )

An Adult Protected Person. )

Case Number: G-19-052263-A  
Department: B

Date of Hearing: February 11, 2021  
Time of Hearing: 9:30 a.m.

**EX PARTE PETITION FOR AN ORDER FOR THE ATTENDANCE OF THE  
PROTECTED PERSON AT THE FEBRUARY 11, 2021 HEARING**

☐ TEMPORARY GUARDIANSHIP  
☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☒ GENERAL GUARDIANSHIP  
☐ Person  
☐ Estate ☐ Summary Admin.  
☒ Person and Estate

☐ SPECIAL GUARDIANSHIP  
☐ Person  
☐ Estate ☐ Summary Admin.  
☐ Person and Estate

☐ NOTICES / SAFEGUARDS  
☐ Blocked Account  
☐ Bond Posted  
☐ Public Guardian Bond

COMES NOW, Robyn Friedman and Donna Simmons ("Petitioners" or "Robyn" and  
"Donna"), as family members and interested parties in this matter, by and through their counsel,

1 the law firm of Michaelson & Associates, Ltd., and file this Ex Parte Petition for an Order for the  
2 Attendance of the Protected Person at the February 11, 2021 Hearing. In support thereof, Petitioner  
3 alleges as follows:

4 1. Petitioners filed a Verified Petition for Communication, Visits, and Vacation Time with  
5 Protected Person (the "Petition") in this matter. The Petitioners provided several examples  
6 regarding how the protected person, Kathleen June Jones ("Ms. Jones"), lacks the ability to plan  
7 visits and otherwise communicate with Petitioners and other family members on her own, without  
8 the assistance from her guardian, Kimberly Jones ("Kim"). Petitioners request in the Petition that  
9 this Court order simple logistics to be implemented to ensure that Ms. Jones receives the assistance  
10 she requires from Kim to communicate and visit with Petitioners.

11 2. On January 25, 2021, Ms. Jones and Kim filed Oppositions to the Petition. Both  
12 Oppositions contend that Ms. Jones does not want to be told what to do and that the Protected  
13 Person's Bill of Rights precludes the relief Petitioners request.

14 3. On February 1, 2021, Petitioners filed a Reply detailing an extreme disconnect between  
15 what counsel for Ms. Jones and Kim are representing to this Court and what Petitioners are  
16 experiencing in reality in terms of, among other things, Ms. Jones' desires and her ability to  
17 remember past visits and plan and follow through on future visits without help from her guardian.  
18 The Reply also sets forth how the requested relief actually furthers Ms/ Jones' protection under  
19 the Bill of Rights.  
20

21 4. Due to the extreme disconnect between what is being represented by Legal Aid and  
22 guardian's counsel and what Petitioners experience in reality, Petitioners believe it is exceptionally  
23 important that Ms. Jones attend the February 11, 2021 hearing to understand what is taking place  
24



1 in her case, and so the Court is able to hear Ms. Jones communicate her preferences regarding the  
2 outcome of this Petition.

3 5. On February 4, 2021, counsel for Petitioners emailed counsel for Kim expressing  
4 Petitioners' belief that Ms. Jones' attendance at the February 11, 2021 hearing on the Petition is  
5 imperative and asked for counsel to confirm whether she would be present. If not, Counsel warned  
6 that Petitioners would be forced to act including requesting the Court's intervention to ensure Ms.  
7 Jones' attendance. *See* Affidavit of John Michaelson, Esq. at ¶ 3.

8 6. That same day, counsel for Kim responded that Ms. Jones attending the hearing wasn't  
9 "happening." He claimed that her participation in a hearing regarding visitation and  
10 communication with her children and grandchildren solves nothing and "will subject June to  
11 unnecessary stress." *See* Affidavit of John Michaelson, Esq. at ¶ 3-4.

12 7. These comments from counsel for Kim directly contradict statements in the Opposition  
13 filed by counsel for Ms. Jones. In that Opposition, counsel for Ms. Jones admits that "June is  
14 perfectly capable of expressing, as well as managing, with whom and how she wishes to  
15 communicate." *See* LACSN's Opposition at p. 4:4-5.

16 8. If Ms. Jones is so capable of perfectly expressing herself, then she should have no issue  
17 expressing her thoughts and desires regarding the Petition to this Court – especially given the  
18 deeply personal nature of the Petition and how it affects her life.

19 9. Also, it is difficult to understand why appearing at this important hearing would be so  
20 burdensome given the fact that the hearing is virtual and would require no travel for the protected  
21 person, no getting through security at the courthouse, etc.  
22  
23  
24  
25

1 10. The Protected Person's Bill of Rights provide that the protected person has a right to have  
2 a say in the plan of her care. NRS 159.328(f). Additionally, the protected person has a right to  
3 receive telephone calls and have visitors, "unless his or her guardian and the court determine that  
4 particular correspondence or a particular visitor will cause harm to the protected person." NRS  
5 159.328(n).


6 11. It is interesting to note that Legal Aid and guardian's counsel are doing to this Court what  
7 they have been doing to Petitioners all along: preventing access to the protected person by anyone  
8 who may challenge them.

9 12. Accordingly, Petitioners believe it is vital that Ms. Jones attend the hearing on February  
10 11, 2021. This will allow the Court to hear directly from Ms. Jones about her desires in this plan  
11 of her care including whether her plan should include communication and visits with her daughters.  
12 Therefore, Petitioners request that the Court enter an order for the protected person to attend the  
13 February 11, 2021 hearing.

14 WHEREFORE, Petitioner prays as follows:

15 1. That the Court enter an order directing that Ms. Jones attend the February 11, 2021 hearing.  
16  
17

18 MICHAELSON & ASSOCIATES, LTD.

19 By:   
20 John P. Michaelson, Esq.  
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24 2200 Paseo Verde Parkway, Ste. 160  
25 Henderson, Nevada 89052  
Counsel for Petitioners

**CERTIFICATE OF SERVICE**

Pursuant to NEFCR 9, the undersigned hereby certifies a copy of the EX PARTE PETITION FOR AN ORDER FOR THE ATTENDANCE OF THE PROTECTED PERSON AT THE FEBRUARY 11, 2021 HEARING was served on the following individual on February 6, 2021, to the following individuals:

Geraldine Tomich, Esq. gtomich@maclaw.com  James Beckstrom, Esq. jbeckstrom@maclaw.com  Cheryl Becnel cbecnel@maclaw.com  <i>Attorneys for Kimberly Jones</i>	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada mparra@lacsns.org  Alexa Reanos areanos@lacsns.org
Jeffrey R. Sylvester jeff@sylvesterpolednak.com  Kelly L. Easton kellye@sylvesterpolednak.com  Co-Counsel for Petitioners, Robyn Friedman and Donna Simmons	Kate McCloskey NVGCO@nvcourts.nv.gov  LaChasity Carroll lcarrol@nvcourts.nv.gov  Sonja Jones sjones@nvcourts.nv.gov

Pursuant to NRCP 5, the undersigned hereby certifies a copy of the EX PARTE PETITION FOR AN ORDER FOR THE ATTENDANCE OF THE PROTECTED PERSON AT THE FEBRUARY 11, 2021 HEARING was mailed by US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada on the following individual on February 8, 2021, to the following individuals and/or entities at the following addresses:

Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Teri Butler 586 N. Magdalena Street Dewey, AZ 86327
Courtney Simmons 765 Kimbark Avenue San Bernardino, CA 92407	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805
Ampersand Man 2824 High Sail Court Las Vegas, Nevada 89117	Tiffany O'Neal 177 N. Singingwood Street, Unit 13 Orange, CA 92869

MICHAELSON & ASSOCIATES, LTD.

/s/ Lenda Murnane  
Employee of Michaelson & Associates



**AFDD**

John P. Michaelson, Esq.  
Nevada Bar No. 7822  
Email: [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)  
Ammon E. Francom, Esq.  
Nevada Bar No. 14196  
Email: [ammon@michaelsonlaw.com](mailto:ammon@michaelsonlaw.com)  
MICHAELSON & ASSOCIATES, LTD.  
2200 Paseo Verde Parkway, Ste. 160  
Henderson, Nevada 89052  
Ph: (702) 731-2333  
Fax: (702) 731-2337  
Counsel for Robyn Friedman and Donna Simmons

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )  
Kathleen June Jones, )  
An Adult Protected Person. )

Case Number: G-19-052263-A  
Department: B

**AFFIDAVIT IN SUPPORT OF**  
**EX PARTE PETITION FOR AN ORDER FOR THE ATTENDANCE OF THE**  
**PROTECTED PERSON AT THE FEBRUARY 11, 2021 HEARING**

STATE OF NEVADA )  
COUNTY OF CLARK ) ss:

I, John P. Michaelson, Esq. being duly sworn, depose and state as follows:

1. I am an attorney and principal with the law firm of Michaelson & Associates, Ltd. I am over 18 years of age; I am competent to testify to the facts stated herein and could provide such

1 testimony if called upon to do so, and I have personal knowledge of the facts stated within this  
2 affidavit, except those facts which are stated upon information and belief.

3 2. On February 4, 2021, I emailed James Beckstrom, Esq. expressing Petitioners' belief that  
4 Ms. Jones' attendance at the February 11, 2021, hearing on the Petition is imperative and asked  
5 Mr. Beckstrom to confirm whether Ms. Jones would be present. If not, I warned that Petitioners  
6 would be forced to act by requesting this Court's intervention to ensure Ms. Jones' attendance. See  
7 email string attached hereto as **Exhibit 1** and incorporated herein by reference.

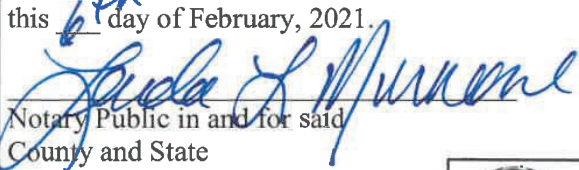
8 3. That same day, Mr. Beckstrom responded "I appreciate your clients feeling. But that isn't  
9 happening. . . . Doing so does nothing and will subject June to unnecessary stress." See **Exhibit 1**.

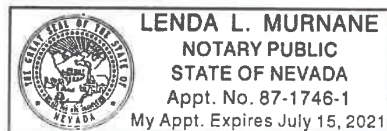
10 4. Within the context of the emails, Mr. Beckstrom also states that Ms. Jones speaking with  
11 this Court while Ms. Jones is not in the presence of her counsel or guardian or anyone else, so this  
12 Court can gain perspective on Mr. Jones' desires (what I wrote), is "[i]solating someone from their  
13 neutral legal counsel and self-selected Guardian, who is unable to make decisions as your clients  
14 claim is the epitome of unreasonableness," (what Mr. Beckstrom wrote).

15 DATED: this 6th day of February 2021.

16  
17   
JOHN P. MICHAELSON

18 SUBSCRIBED AND SWORN to before me  
19 this 6th day of February, 2021.

20   
21 Notary Public in and for said  
County and State





## EXHIBIT 1

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## Lenda Murnane

---

**From:** John Michaelson  
**Sent:** Friday, February 5, 2021 5:32 PM  
**To:** Lenda Murnane  
**Subject:** FW: Kathleen June Jones

John P. Michaelson, Esq. | MICHAELSON & ASSOCIATES, LTD. | [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com) | 702.731.2333

**From:** James A. Beckstrom <[jbeckstrom@maclaw.com](mailto:jbeckstrom@maclaw.com)>  
**Sent:** Thursday, February 04, 2021 10:34 AM  
**To:** John Michaelson <[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)>  
**Subject:** RE: Kathleen June Jones

John,

I appreciate your clients feelings. But that isn't happening. If the Court decides that is necessary—I doubt it will. That can be ordered. Doing so does nothing and will subject June to unnecessary stress.

Isolating someone from their neutral legal counsel and self-selected Guardian, who is unable to make decisions as your clients claim is the epitome of unreasonableness.

I want to be open to working on this issue, but the demands are unreasonable and the accusations and allegations continue to inflame the passion of those involved in this case. At this point, we want to hear what the judge has to say.



**James A. Beckstrom, Esq.**

10001 Park Run Drive  
Las Vegas, NV 89145  
t | 702.207.6081  
f | 702.382.5816  
[jbeckstrom@maclaw.com](mailto:jbeckstrom@maclaw.com)  
[maclaw.com](http://maclaw.com)



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DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

**From:** John Michaelson <[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)>  
**Sent:** Thursday, February 4, 2021 9:37 AM  
**To:** James A. Beckstrom <[jbeckstrom@maclaw.com](mailto:jbeckstrom@maclaw.com)>  
**Subject:** [External] Kathleen June Jones

James, we feel it is imperative that June attend this hearing. Ideally, it would be best if she could speak with the judge while she is not in the presence of Kimberly or Maria or anyone else really, so that the judge can get her own feel for June's desires. At a minimum though, June needs to be there. Please confirm if she will be there. If you cannot, we will be forced to take action to ask the court to ensure her attendance.

John P. Michaelson, Esq.  
MICHAELSON & ASSOCIATES, LTD.  
[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)  
[www.michaelsonlaw.com](http://www.michaelsonlaw.com)  
Tel. (702) 731-2333  
Fax. (702) 731-2337

**The District**

2200 Paseo Verde Parkway, Suite 160  
Henderson, Nevada 89052

\*Please send correspondence to Henderson address

**Downtown Summerlin**

1980 Festival Plaza Drive, Suite 300  
Las Vegas, Nevada, 89135

**Reno**

5470 Kietzke Lane, Suite 300  
Reno, Nevada 89511

---

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To ensure compliance with requirements imposed by the IRS Circular 230, we hereby inform you that any U. S. tax advice contained in this communication (including attachments, if any) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any matter addressed herein.

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Location : Family Courts   Images Help

**CASE No. G-19-052263-A**

www.pearsoned.com

Case Type: **Guardianship of Adult**  
 Subtype: **General - Person & Estate**  
 Date Filed: **09/19/2019**  
 Location: **Department B**  
 Case Number: **G052263**  
 Case Court No.: **81414**  
**81799**  
**83967**  
**84655**

<b>Guardian of Person and Estate</b>	<b>Friedman, Robyn</b> 2824 High Sail Court Las Vegas,, NV 89117	<b>Lead Attorneys</b> <b>John P. Michaelson</b> <i>Retained</i> 7027312333(W)
<b>Objector</b>	<b>Jones, Kimberly</b> 18543 Yorba Linda Blvd #146 Yorba Linda, CA 92886	<b>Pro Se</b>
<b>Petitioner</b>	<b>Friedman, Robyn</b> 2824 High Sail Court Las Vegas,, NV 89117	<b>John P. Michaelson</b> <i>Retained</i> 7027312333(W)
<b>Petitioner</b>	<b>Simmons, Donna</b> 1441 N. Redgum, Unit G Anaheim, CA 92806	<b>John P. Michaelson</b> <i>Retained</i> 7027312333(W)
<b>Protected Person</b>	<b>Jones, Kathleen June</b> 1315 Enchanted River DR Henderson, NV 89012	<b>Elizabeth R. Mikesell</b> <i>Retained</i> 702-386-1533(W)

02/11/2021 | [All Pending Motions](#) (9:30 AM) (Judicial Officer Marquis, Linda)

02/11/2021 9:30 AM

- HEARING: GUARDIAN OF THE PROTECTED PERSON'S PETITION TO COMPROMISE PROPERTY OF PROTECTED PERSON AND SEAL HEARING... HEARING: VERIFIED PETITION FOR COMMUNICATION, VISITS AND VACATION TIME WITH PROTECTED PERSON... KATHLEEN June JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS AND VACATION TIME WITH PROTECTED PERSON... KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS AND VACATION TIME WITH PROTECTED PERSON... PETITIONERS OMNIBUS REPLY TO: (1) KIMBERLY JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS AND VACATION TIME WITH PROTECTED PERSON; AND (2) KATHLEEN June JONES' OPPOSITION TO VERIFIED PETITION FOR COMMUNICATION, VISITS AND VACATION TIME WITH PROTECTED PERSON in accordance with Administrative Order 20-01, out of an abundance of caution, in order to prevent the spread of COVID-19 infection in the community, this Hearing was held via video conference through BlueJeans. Court Clerks: Karen Christensen, Tanya Stengel (ts) James Beckstrom, Nevada Bar #14032, appeared on behalf of Kimberly Jones. Teri Butler, Protected Person's Daughter, appeared. Perry Friedman, Protected Person's Son-in-law, appeared. Legal Aid Observer: Jeffery Sheehan, Esq. The Court reviewed the case history and pleadings on file. Attorney Parra-Sandoval stated she has spoken

to Protected Person about the settlement offer and she is agreeable to the terms. Upon inquiry from the Court, Attorney Parra-Sandoval stated she supports the Guardian's request to seal and believes the request to seal for 120 days is the most appropriate. Attorney Beckstrom made statements regarding Attorney Kehoe and Mr. Powell being present at the hearing and stated it prohibits parties from openly discussing the settlement. Attorney Michaelson made statements and requested the entire proceeding be sealed. Court and Counsel engaged in discussion regarding the Petition to Seal; in what manner the case should be sealed, and what parties should be allowed to participate in the sealed hearing. Court stated it reviewed the Petition for Communication, Visits and Vacation Time with Protected Person and inquired if there were any objections or concerns. Ms. Butler made statements opposing the Petition and stated Robyn has a need to control everything. Court and Ms. Butler engaged in discussion regarding her concerns. Arguments by Counsel. Court stated it would not be Ordering FMC (Family Mediation Center) because the Court is unsure if they are well-prepared and/or well-suited to resolve this issue. Court further stated it would also not be Ordering Guardianship mediation or Talking Parents. Attorney Michaelson stated if the settlement is approved, it would leave Protected Person in a possible homeless situation and there are concerns about Protected Person being moved out of state because of that situation. Attorney Michaelson stated he does not believe that should be allowed to happen without permission from the Court. Court stated that issue would be addressed at the sealed hearing; however, the Court advised ALL Counsel that before Protected Person is relocated a Petition would be required to be filed with the Court. COURT ORDERED, the following: Petition to Seal the hearing relative to the Petition to Compromise Property shall be APPROVED and GRANTED. The HEARING shall be SEALED for ONE HUNDRED AND TWENTY (120) DAYS. Attorney Beckstrom shall prepare and submit an Order. Matter set for HEARING 2/12/21 at 9:00 am for Approval of Settlement Agreement. THIS HEARING SHALL BE SEALED. Matter set for STATUS CHECK 6/3/21 at 1:00 pm to determine if the hearing should be UNSEALED. Guardian Ad Litem, Elizabeth Brickfield, shall be appointed to represent the Protected Person. A Supreme Court Investigator shall be APPOINTED to investigate this case. The Investigator shall review current medical records and current suggestions and/or recommendations by Protected Person's Physician about her level of care; speak with all Protected Person's daughters, Robyn, Donna, and Teri, (their counsel may be present) to discuss visitation, time together, communications, and their needs, requests, and concerns with regard to Protected Person; review all records relative to conversations with the siblings as well as phone call and text message records supplied to Investigator by family members to assist Court in applying statutes as to whether or not Guardian has been acting unreasonably. Matter shall be CONTINUED to 5/13/21 at 1:00 pm for INVESTIGATOR'S REPORT, Petition for Communication, Visits and Vacation Time with Protected Person, and Oppositions.

[Parties Present](#)[Return to Register of Actions](#)

1 OAI

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 In the Matter of the Guardianship  
7 of:  
8 Kathleen Jones,  
9 Protected Person(s)

Case No.: G-19-052263-A  
Department: B  
Return Hearing: May 13,  
2021 at 1:00 PM

10  
11  
12  
13 **ORDER TO APPOINT INVESTIGATOR**

14 This matter has been reviewed by the Court. The Court, having  
15 jurisdiction of the subject matter, finds an investigation is required in this  
16 matter.

17 **IT IS HEREBY ORDERED:**

- 18  
19 1. The Court appoints the following as investigator in this matter:  
20 Kate McCloskey, State Guardianship Compliance Officer, or  
21 designee  
22 201 S. Carson Street, Suite 250  
23 Carson City, NV 89701-4702  
24 Phone: 775-684-1783  
25 Fax: 775-684-1723  
26  
27 2. The State Guardianship Compliance Officer shall conduct an  
28 investigation into the Protected Person's personal circumstances  
including, but not limited to, the Protected Person's medical and



1 psychiatric/psychological condition, care and maintenance,  
2 educational status, placement, and financial status.

3 3. Specifically, the State Guardianship Compliance Officer shall review  
4 current medical records and current suggestions by the Protected  
5 Person's physician about her level of care; speak with all sisters  
6 Robyn, Donna, and Teri, whose Counsel may be present, to discuss  
7 visitation, time together, communications, and their needs, requests,  
8 and concerns regarding the Protected Person; review all records  
9 relative to conversations with the siblings as well as phone call and  
10 text message records supplied to the investigator by family members,  
11 to assist the Court in determining if the Guardian has been acting  
12 unreasonably under statute.

13 4. Upon presentation of this Order to any hospital, medical care  
14 facility, health care provider, educational institution, human  
15 service agency, financial institution, or other agency or individual  
16 providing placement, care, treatment, services, or benefits to the  
17 Protected Person, including records of protected health information  
18 under the provision of the Federal Health Insurance Portability and  
19 Accountability Act of 1996, the State Guardianship Compliance  
20 Officer shall be authorized to access, review, and/or copy any  
21 record relating to the Protected Person, within the scope of this  
22 investigation.

23 ///

24 ///

25 ///

1 5. The State Guardianship Compliance Officer shall file a written  
2 report with the Court, documenting the results of this investigation.  
3 The investigative report shall be sent to the parties in this matter,  
4 by the State Guardianship Compliance Officer.

5 **IT IS SO ORDERED.**

6 Dated this \_\_\_\_ day of \_\_\_\_\_, 2021.  
7  
8  
9

10 **DISTRICT COURT JUDGE**

11  
12 Dated this 12th day of February, 2021

13 *Linda Marquis*  
14

15 098 CB1 10FC D228  
16 Linda Marquis  
17 District Court Judge  
18  
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1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 In the Matter of the Guardianship  
7 of:

8 Kathleen Jones, Protected  
9 Person(s)

CASE NO: G-19-052263-A

DEPT. NO. Department B

10 **AUTOMATED CERTIFICATE OF SERVICE**

11  
12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order to Appoint State Investigator was served via the court's  
14 electronic eFile system to all recipients registered for e-Service on the above entitled case as  
15 listed below:

16 Service Date: 2/12/2021

17 Kelly Easton	kellye@sylvesterpolednak.com
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26 Kate McCloskey	NVGCO@nvcourts.nv.gov
27 Sonja Jones	sjones@nvcourts.nv.gov

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2		
3	Matthew Piccolo	matt@piccololawoffices.com
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5	John Michaelson	john@michaelsonlaw.com
6	John Michaelson	john@michaelsonlaw.com
7	David Johnson	dcj@johnsonlegal.com
8	Geraldine Tomich	gtomich@maclaw.com
9	Matthew Whittaker	matthew@michaelsonlaw.com
10		
11	Ammon Francom	ammon@michaelsonlaw.com
12	Matthew Whittaker	matthew@michaelsonlaw.com
13	Ammon Francom	ammon@michaelsonlaw.com

1 **OGAL**

2  
3 **DISTRICT COURT**  
4 **CLARK COUNTY, NEVADA**

5 In the Matter of the Guardianship of:

6 Kathleen Jones,

7 Protected Person.

Case Number: G-19-052263-A

Department: B

Hearing: May 13, 2021  
1:00 PM

10  
11 **ORDER APPOINTING GUARDIAN AD LITEM**

12 This matter has been reviewed by the Court. The Court, having  
13 jurisdiction of the subject matter, finds a guardian ad litem is required in this  
14 matter.  
15

16 **THE COURT FINDS** that the Protected Person or Proposed Protected  
17 Person will benefit from the appointment and services of a guardian ad litem and  
18 that a guardian ad litem will be beneficial in determining the best interest of the  
19 Protected Person pursuant to NRS 159.0455 and Nevada Guardianship Rule 8.  
20

21 **IT IS HEREBY ORDERED** that the following person, an attorney with  
22 appropriate training and experience, shall be appointed the guardian ad litem:

23 Elizabeth Brickfield, Esq.  
24 Dawson & Lordahl PLLC  
25 8925 West Post Road Suite 210  
26 Las Vegas, Nevada 89148

**IT IS FURTHER ORDERED** that the guardian ad litem is directed to address the following issues:

Scheduled opportunities for Protected Person to elect to speak with and/or visit in person with her adult daughters and whether the Guardian has an obligation to facilitate, prompt, encourage, plan, schedule, and/or create an environment that promotes an opportunity for continued communication between Protected Person and her adult daughters based upon the current level of care and needs of the Protected Person. See Verified Petition for Communication, Visits, and Vacation Time with Protected Person, filed December 30, 2020, Oppositions filed January 25, 2021; and hearing held on February 11, 2021.

**IT IS FURTHER ORDERED** that the guardian ad litem shall not offer legal advice to the Protected Person or Proposed Protected Person, but shall advocate for the best interest of the Protected Person in a manner that will enable the court to determine the action that will be the least restrictive and in the best interests of the Protected Person and provide any information required by the court pursuant to NRS 159.0455 until relieved by order of the court.

**IT IS FURTHER ORDERED** that the guardian ad litem shall zealously advocate for the best interest of the Protected Person in a manner that will enable the court to determine the action that will be the least restrictive and in the best interest of the Protected Person or Proposed Protected Person.

**IT IS FURTHER ORDERED** that the guardian ad litem is an officer of the court and a representative of the Protected Persons or Proposed Protected Persons and is not a party to the case.

**IT IS FURTHER ORDERED** that the guardian ad litem is an officer of the court and a representative of the protected person or proposed protected person and is not a party to the case.

**IT IS FURTHER ORDERED** that the guardian ad litem shall not have authority to waive any of the protected person's or proposed protected person's due process rights or protections, including, without limitation, the protected person's or proposed protected person's right to counsel, right to oppose the guardianship, right to oppose the choice of guardian, right to attend hearings, and right to object to any action or proposed action by the guardian.

**IT IS FURTHER ORDERED** that the guardian ad litem shall advocate for the best interest of the Protected Persons or Proposed Protected Persons based on admissible evidence available to the guardian ad litem. The guardian ad litem shall conduct independent investigation and assessment of the facts to carry out the directives of the appointing order and may submit recommendations to the court that are based on admissible evidence.

**IT IS FURTHER ORDERED** that the guardian ad litem shall not be a witness and shall not testify or be cross-examined. The guardian ad litem shall not be subject to a subpoena, except to the extent an attorney representing the Protected Persons or Proposed Protected Persons would be subject to a subpoena.

**IT IS FURTHER ORDERED** that a guardian ad litem that seeks compensation for the services provided is only entitled to compensation upon compliance with NRS 159.344 et al., and the request for payment, whether or not payment is to be from the guardianship estate or from any third party, shall be



1 subject to the requirements and analysis as set forth in NRS 159.344. The  
2 guardian ad litem may request fees from the guardianship estate or a third party.

3  
4 **IT IS FURTHER ORDERED** that an attorney that serves as a guardian ad  
5 litem is bound by the Nevada Rules of Professional Conduct to the extent those  
6 rules are applicable.

7 **IT IS FURTHER ORDERED** that the guardian ad litem shall not  
8 communicate with any party represented by counsel outside the presence of the  
9 party's attorney without first obtaining the attorney's consent.

10  
11 **IT IS FURTHER ORDERED** that the guardian ad litem shall provide a  
12 copy to all parties of any written report of the guardian ad litem that is filed with  
13 the court.

14 **IT IS FURTHER ORDERED** that the role of the guardian ad litem is  
15 separate and distinct from the role of an attorney for a protected person or  
16 proposed protected person appointed pursuant to NRS 159.0485 and separate and  
17 distinct from an investigator appointed pursuant to NRS 159.046. A guardian ad  
18 litem for a protected person or proposed protected person shall not serve as an  
19 attorney for a protected person or proposed protected person, as an attorney for a  
20 guardian(s) or as an investigator in the same case or in a related matter.

21  
22 **IT IS FURTHER ORDERED** that the guardian ad litem shall ensure the  
23 rights set forth in the Protected Persons Bill of Rights are upheld and the guardian  
24 ad litem shall immediately report to the court any transgressions of said rights.

**IT IS FURTHER ORDERED** that the guardian ad litem who represents siblings or spouses in a guardianship shall be alert to potential conflicts and request that the court appoint a separate guardian ad litem in the event that a conflict or potential conflict should arise.

**IT IS SO ORDERED.**

Dated this \_\_\_\_ day of \_\_\_\_\_, 2021.

Dated this 16th day of February, 2021

Juda Margulis

DISTRICT COURT JUDGE

**F58 915 7598 0A23**  
**Linda Marquis**  
**District Court Judge**

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 In the Matter of the Guardianship  
7 of:

8 Kathleen Jones, Protected  
9 Person(s)

CASE NO: G-19-052263-A

DEPT. NO. Department B

10 **AUTOMATED CERTIFICATE OF SERVICE**

11  
12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order Appointing Guardian Ad Litem was served via the court's  
14 electronic eFile system to all recipients registered for e-Service on the above entitled case as  
15 listed below:

16 Service Date: 2/16/2021

17 Kelly Easton	kellye@sylvesterpolednak.com
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6	John Michaelson	john@michaelsonlaw.com
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1 **NOA**

2 Elizabeth Brickfield, Esq. NSB #6236  
3 DAWSON & LORDAHL PLLC  
4 8925 West Post Road, Suite 210  
5 Las Vegas, Nevada 89148  
6 Telephone: (702) 476-6440  
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9 *Guardian ad Litem for Kathleen Jones*

6 **DISTRICT COURT**  
7 **CLARK COUNTY, NEVADA**

8 In the Matter of the Guardianship of:

9 KATHLEEN JONES

10 Protected Person.

Case No.: G-19-052263-A

Dept. No.: B

Hearing Date: May 13, 2021

Hearing Time: 1:00 p.m.

12 **NOTICE OF APPEARANCE**

13  
14 PLEASE TAKE NOTICE that Elizabeth Brickfield, Esq., of the law firm of DAWSON &  
15 LORDAHL PLLC, has been appointed as GUARDIAN AD LITEM for KATHLEEN JONES,  
16 protected person.

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1 Please direct all further communication, filings or correspondence to the undersigned at the  
2 foregoing address and phone number.

3 DATED this 22 day of February 2021.  
4

5 DAWSON & LORDHAL PLLC

6  
7   
8 Elizabeth Brickfield, Esq. NSB #6236  
9 8925 West Post Road, Suite 210  
10 Las Vegas, Nevada 89148  
11 Telephone: (702) 476-6440  
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*Guardian ad Litem for Kathleen Jones*

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Maria L. Parra-Sandoval, Esq. LEGAL AID OF SOUTHERN NEVADA 725 E. Charleston Blvd. Las Vegas, NV 89104 <a href="mailto:mparra@lasn.org">mparra@lasn.org</a> <i>Attorney for Protected Person</i>	Tiffany O'Neal 177 N. Singingwood Street, Unit 13 Orange, CA 92869
Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Ampersand Man 2824 High Sail Court Las Vegas, Nevada 89117
Courtney Simmons 765 Kimbark Avenue San Bernardino, CA 92407	Scott Simmons 1054 S. Verde Street Anaheim, CA 92805

3





**EXPP**

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Ph: (702) 731-2333  
Fax: (702) 731-2337  
Counsel for Robyn Friedman and Donna Simmons

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )  
Kathleen June Jones, )  
An Adult Protected Person. )

Case No.: G-19-052263-A  
Dept. No.: B

**EX PARTE PETITION TO SHORTEN TIME TO HEAR VERIFIED PETITION FOR  
COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON**

Robyn Friedman and Donna Simmons ("Petitioners" or "Robyn" and "Donna"), by and through the law firm Michaelson and Associates, Ltd., hereby submit this **Ex Parte Petition to Shorten Time** and requests this Court set the hearing on Petitioners' Verified Petition for Communication, Visits, and Vacation Time with Protected Person on shortened time and in support thereof, respectfully alleges as follows:

1. The parties have completed briefing on Petitioners' Verified Petition for Communication, Visits, and Vacation Time with Protected Person (the "Petition"). On December 30, 2020, Petitioners filed the Petition with the Court. On December 31, 2020, Petitioners filed a Supplement to the Petition. On January 25, 2021, the Protected Person and Guardian of the

1 Protected Person filed separate oppositions to the Petition. On February 1, 2021, Petitioners filed  
2 an Omnibus Reply supporting their Petition.

3 2. The Court initially scheduled the hearing on the Petition for February 11, 2021. At the  
4 hearing on February 11, 2021, this Court granted Petitioners' request for the appointment of a  
5 guardian ad litem and further appointed the State Guardianship Compliance Officer to  
6 investigate this matter. The Court continued the hearing on the Petition to May 13, 2021, to  
7 allow the guardian ad litem and investigator time to review this matter.

8 3. A status check on the Guardian's Petition to Compromise Property of the Protected  
9 Person and Seal Hearing (the "Compromise Petition") is currently scheduled for a sealed hearing  
10 on March 11, 2021 at 2:00 p.m.

11 4. At the last hearing on March 4, 2021, Petitioners voiced their concern that the Protected  
12 Person may be moved out of the Court's jurisdiction without the communication and visits relief  
13 requested in the Petition. *See* Affidavit of John P. Michaelson, Esq. below at ¶ 4. The Court  
14 mentioned that it was willing to move forward the May 13, 2021 hearing on the Petition on an  
15 order shortening time to the March 11, 2021 hearing to address Petitioners' concerns. *Id.*

16 5. Petitioners reiterate the concern in this Ex Parte Petition. The Guardian may move the  
17 Protected Person out of this Court's jurisdiction. *Id.* at ¶ 5. As stated in the Petition, Petitioners  
18 believe there are compelling reasons for the Court to order a schedule of opportunities for the  
19 Protected Person to communicate and visit with the Protected Person's family including  
20 Petitioners. *Id.* Petitioners have spent the last couple of years before this Court – expending  
21 substantial resources – culminating in the relief requested in the Petition. *Id.* The Petitioners are  
22 concerned that if the Protected Person is relocated out of the Court's jurisdiction, then Petitioners  
23 will be required to begin this process over again before a different court. *Id.* Accordingly,  
24  
25

1 Petitioners request that this Court entertain the remaining relief requested in the Petition at the  
2 hearing on March 11, 2021. *Id.*

3 DATED this 9<sup>th</sup> day of March, 2021.

4  
5 MICHAELSON & ASSOCIATES, LTD.

6 John P. Michaelson  
7 John P. Michaelson, Esq.  
8 Nevada Bar No. 7822  
9 Ammon E. Francom, Esq.  
10 Nevada Bar No. 14196  
11 2200 Paseo Verde Parkway, Ste. 160  
12 Henderson, Nevada 89052  
13 Counsel for Petitioners  
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25



**AFFT**  
John P. Michaelson, Esq.  
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Fax: (702) 731-2337  
Counsel for Robyn Friedman and Donna Simmons

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )  
Kathleen June Jones, )  
An Adult Protected Person. )

Case No.: G-19-052263-A  
Dept. No.: B

**AFFIDAVIT OF JOHN P. MICHAELSON ESQ. IN SUPPORT OF EX PARTE  
PETITION TO SHORTEN TIME TO HEAR VERIFIED PETITION FOR  
COMMUNICATION, VISITS, AND VACATION TIME WITH PROTECTED PERSON**

STATE OF NEVADA )  
): ss.  
COUNTY OF CLARK )

1. I am the principal and owner of the law firm of Michaelson & Associates, Ltd.  
maintaining offices at 2200 Paseo Verde Parkway, Ste. 160, Henderson, Nevada 89052.

2. I am a member of the State Bar and am duly licensed to practice law in the State of  
Nevada.

3. I represent Robyn Friedman and Donna Simmons in this matter.

4. At the last hearing on March 4, 2021, Petitioners voiced their concern that the Protected  
Person may be moved out of the Court's jurisdiction without the communication and visits relief

1 requested in the Petition. The Court mentioned that it was willing to move forward the May 13,  
2 2021 hearing on the Petition on an order shortening time to the March 11, 2021 hearing to  
3 address Petitioners' concerns.

4 5. The Guardian may move the Protected Person out of this Court's jurisdiction. As stated  
5 in the Petition, Petitioners believe there are compelling reasons for the Court to order a schedule  
6 of opportunities for the Protected Person to communicate and visit with the Protected Person's  
7 family including Petitioners. Petitioners have spent the last couple of years before this Court –  
8 expending substantial resources – culminating in the relief requested in the Petition. The  
9 Petitioners are concerned that if the Protected Person is relocated out of the Court's jurisdiction,  
10 then Petitioners will be required to begin this process over again before a different court.  
11 Accordingly, Petitioners request that this Court entertain the remaining relief requested in the  
12 Petition at the hearing on March 11, 2021.

13  
14 6. Based on the foregoing, Petitioners request that the Petition be heard on shortened time  
15 and the hearing be moved up from May 13, 2021 to March 11, 2021.

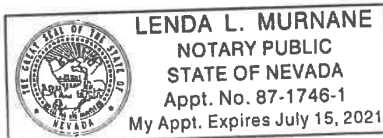
16 **FURTHER, YOUR AFFIANT SAYETH NAUGHT**

17   
18 John P. Michaelson, Esq.

19 SUBSCRIBED and SWORN to before me

20 this  day of March, 2021.

21   
22 NOTARY PUBLIC





1 **Marquis Aurbach Coffing**  
 2 Geraldine Tomich, Esq.  
 3 Nevada Bar No. 8369  
 4 James A. Beckstrom, Esq.  
 5 Nevada Bar No. 14032  
 6 10001 Park Run Drive  
 7 Las Vegas, Nevada 89145  
 Telephone: (702) 382-0711  
 Facsimile: (702) 382-5816  
 gtomich@maclaw.com  
 jbeckstrom@maclaw.com  
*Attorneys for Kimberly Jones, Guardian  
 of the Protected Person June Jones*

**DISTRICT COURT****CLARK COUNTY, NEVADA**

10 In the Matter of the Guardianship of the Person  
 11 and Estate of,

12 KATHLEEN JUNE JONES,  
 13 Protected Person.

Case No.: G-19-052263-A  
 Dept. No.: B

**KIMBERLY JONES' MEMORANDUM OF STATUS**

16 Kimberly Jones, Guardian of the Protected Person June Jones, by and through the law  
 17 firm of Marquis Aurbach Coffing, hereby submits its Memorandum of Status.

**I. STATUS**

19 Since the last appearance before this Court, Kimberly Jones ("Kimberly") has been busy  
 20 exploring the most suitable option for June Jones ("June") in light of the deadline for removal  
 21 from the Kraft Avenue Property. Kimberly, having consulted with June again on the option of  
 22 moving to June's home in Anaheim, California, presents the Court and all interested parties to  
 23 this case the following:

24 1. The Anaheim Property is located at 1054 S. Verde Street, Anaheim, CA 92805.  
 25 This property is currently occupied by tenants, paying \$2,500. The term is one year. However, a  
 26 60-day termination clause exists. *See* Lease Agreement, attached as **Exhibit 1**. Kimberly has  
 27 explained the situation to the current tenants and has negotiated an expedited termination,  
 28 wherein the tenants have stated they can be moved out of the property *on or about April 1, 2021*.

1           2.       June is willing to move to the Anaheim Property, after Kimberly discussed the  
2 available options with her, including the difficulty locating housing in the current rental market.  
3 June is excited for what she calls a “new adventure.” Kimberly has continued to review rental  
4 options in California and Las Vegas and the Anaheim Property remains the most appropriate  
5 option, as acknowledged by this Court.

6           3.       The Anaheim Property currently has a mortgage in June’s name totaling \$820.00  
7 per month, inclusive of property taxes. Anticipated utilities for the home are conservatively  
8 estimated at \$500 per month. The total monthly costs for this home would be approximately  
9 \$1,320.00.

10          4.       Kimberly and June would have their own rooms at the Anaheim Property. The  
11 breakdown would be June paying approximately \$250 per month (half estimated utilities) and  
12 Kimberly paying \$1,070 per month (mortgage plus half utilities). The amount June will be  
13 paying is far below any other available housing in Las Vegas or California.

14          5.       Kimberly can move the limited amount of furniture from the Kraft Avenue  
15 Property on April 1, 2021. This will be done through a U-Haul, estimated to cost between \$500-  
16 \$1,000. The goal is to set the walk-thru contemplated by the Settlement Agreement for April 1,  
17 2021.

18          6.       Because there *could* be a short gap in the time the current tenants vacate the  
19 Anaheim Property and the April 1, 2021 moving date, Kimberly after consulting with June  
20 proposes that after April 1, 2021, should the Anaheim Property not be immediately available to  
21 move in, Kimberly seeks to:

22               a.       Take June to Norco, California to stay temporarily at Woodspring  
23 Extended Stay Suites. During this time June will be close to her daughter Donna and her  
24 grandchildren. June sees this as an adventure and is excited to go to California. The location is  
25 safe, stable, and cost efficient. The hotel provides handicap accessible features. It is pet friendly,  
26 so June can bring her beloved dog with her. It will also allow Kimberly and June to vacate as  
27 soon as the Anaheim Property is available for move in, without any delay. The anticipated cost  
28



1 of lodging for a week during this time period is 646.04. *See* Printout of Anticipated Charges,  
2 attached as **Exhibit 2**; or

3           b.       Take June on a road trip to see June's brother Don Mcgaugagy ("Don").  
4 Don lives in Indiana. Don lives with his wife and June's dear friend Judy. Don and Judy have  
5 invited June and Kimberly to come visit them and stay with them. June desires to see her brother  
6 and Kimberly feels this is a good opportunity to do so. This is a cost-effective option (though  
7 more than the first option) that June wishes to utilize and is consistent with this Court's direction  
8 that a family member would be a good resource to bridge any gap in housing if another option  
9 wasn't viable.

10           7.       If the Court doesn't feel the above stated options are sufficient, the third option  
11 would be keeping June in the Kraft Avenue house with a move out date of April 15, 2021 (as  
12 stated in the Settlement Agreement). If this is done, June will be paying pro-rated rent in the  
13 amount of \$4,000 per month. This is not the best option financially and the first two options are  
14 the most beneficial to June's mental health and finances. The first option allows June to be close  
15 to her new home, with flexible dates of departure, at a location she enjoys staying. The second  
16 option allows June to see her brother she has wanted to see for some time, saves her money, and  
17 provides her with safe and secure housing until her home is open for move-in. ***Kimberly and***  
18 ***June should be allowed, as is standard, to decide which option they prefer***—both options are  
19 safe, financially responsible, and in the best interest of June.

20           8.       Regardless of which option ***this Court approves***, when June moves to the  
21 Anaheim Property, her medical care will be reestablished with the well-respected physicians at  
22 University California Irvine Medical Center ("UCI"). June has previously established care at this  
23 location, there is little need to explain that the world-class care at UCI is appropriate for June.  
24 June maintains Medicare insurance and is in stable health, though she has regular doctor visits.  
25 Kimberly will reestablish care at UCI within a week of moving to Anaheim and will begin the  
26 process of setting up medical record transfers from June's current physicians in Las Vegas.

27           9.       To the extent this Court is in agreement with Kimberly selecting one of the first  
28 two options, Kimberly asks this Court for an order stating so prior to the forthcoming mediation

1 conference set by this Court. This is necessary, because Kimberly continues to have a list of  
2 items to handle prior to the move, including but not limited to: packing, cleaning the Kraft  
3 Avenue Property, coordinating a walk-thru with the legal owners (Dick Powell), transferring/  
4 canceling utilities, attending the settlement conference, reestablishing medical care, and  
5 facilitating the early termination of the existing Anaheim lease.

6 Dated this 18th day of March, 2021.

7 MARQUIS AURBACH COFFING

8  
9 By /s/ James A. Beckstrom  
10 Geraldine Tomich, Esq.  
11 Nevada Bar No. 8369  
12 James A. Beckstrom, Esq.  
13 Nevada Bar No. 14032  
14 10001 Park Run Drive  
15 Las Vegas, Nevada 89145  
16 *Attorney(s) for Kimberly Jones*  
17  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **KIMBERLY JONES' MEMORANDUM OF STATUS** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 18th day of March, 2021. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:<sup>1</sup>

Ty E. Kehoe, Esq.  
KEHOE & ASSOCIATES  
871 Coronado Center Drive, Ste. 200  
Henderson, NV 89052  
*Attorneys for Rodney Gerald Yeoman*

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PICCOLO LAW OFFICES  
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Laura A. Deeter, Esq.  
GHANDI DEETER BLACKHAM  
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Las Vegas, NV 89101  
*Attorneys for Rodney Gerald Yeoman*

Maria L. Parra-Sandoval, Esq.  
LEGAL AID OF SOUTHERN NEVADA  
725 E. Charleston Blvd.  
Las Vegas, NV 89104  
*Attorney for Kathleen June Jones Protected Person*

I further certify that I served a copy of this document by emailing and mailing a true and correct copy thereof, postage prepaid, addressed to:

Jen Adamo  
14 Edgewater Drive  
Magnolia, DE 19962

Teri Butler  
586 N. Magdalena Street  
Dewey, AZ 86327

Courtney Simmons  
765 Kimbark Avenue  
San Bernardino, CA 92407

Scott Simmons  
1054 S. Verde Street  
Anaheim, CA 92805

Ampersand Man  
2824 High Sail Court  
Las Vegas, Nevada 89117

Tiffany O'Neal  
177 N. Singingwood Street, Unit 13  
Orange, CA 92869

/s/ Cheryl Becnel  
An employee of Marquis Aurbach Coffing

<sup>1</sup> Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

# Exhibit 1

# CALIFORNIA RESIDENTIAL LEASE AGREEMENT

**PARTIES: LANDLORD** June Jones/Kimberly Jones Guardian 714-336-8071

**TENANT(S)** \_\_\_\_\_

**DOB:** \_\_\_\_\_ **DL:** \_\_\_\_\_

**PROPERTY ADDRESS:** 1054 S. Verde Street Anaheim Ca. 92805

**1. RENTAL AMOUNT:** Beginning September 1, 20 20 TENANT agrees to pay LANDLORD the sum of \$ 2,500 each month by the first day of each calendar month. Said rent payment to be paid at the following location: Bank Of America 945 S. Brookhurst St. Anaheim, Ca. 92804 by means of deposit into Bank Of America routing number: \_\_\_\_\_

**2. TERM: (A)** The premises are leased on the following term: 1 year lease term beginning September 1, 2020 until September 1, 20 21. At the expiration of said fixed term this lease shall become a month to month tenancy upon the written approval of LANDLORD and either party may terminate this tenancy by the serving of a 60 day written notice.

**(B)** The agreement will start on: \_\_\_\_\_ and will continue as a month-to-month tenancy. In accordance with the State of California statute to terminate the tenancy, the landlord or tenant must give the other party a written \_\_\_\_\_ days notice of non-renewal. The tenant may only terminate their agreement on the last day of any month and the landlord must receive written notification of non-renewal at least \_\_\_\_\_ days prior to the last day of that month. If the tenant plans to leave on or after the first of any month, they are responsible for that months full rent.

**3. SECURITY DEPOSITS:** TENANT shall deposit with landlord a cashiers check in the sum of \$ 2,500 as a security deposit to secure TENANT'S faithful performance of the terms of this lease. All or any portion of the security deposit may be used, as reasonably necessary, to: (i) cure Tenant's default in payment of Rent (which includes Late Charges, NSF fees or other sums due); (ii) repair damage, excluding ordinary wear and tear, caused by Tenant or by a guest or licensee of Tenant; (iii) clean Premises, if necessary, upon termination of the tenancy; and (iv) replace or return personal property or appurtenances. SECURITY DEPOSIT SHALL NOT BE USED BY TENANT IN LIEU OF PAYMENT OF LAST MONTH'S RENT. If all or any portion of the security deposit is used during the tenancy, Tenant agrees to reinstate the total security deposit within five days after written notice is delivered to Tenant. Within 21 days after Tenant vacates the Premises, Landlord shall: (1) furnish Tenant an itemized statement indicating the amount of any security deposit received and the basis for its disposition and supporting documentation as required by California Civil Code § 1950.5(g); and (2) return any remaining portion of the security deposit to Tenant. Security deposit will not be returned until all Tenants have vacated the Premises. Any security deposit returned by check shall be made out to all Tenants named on this Agreement, or as subsequently modified. If TENANT fails to furnish a forwarding address to LANDLORD, then LANDLORD shall send said statement and any security deposit refund to the leased premises. No interest will be paid on security deposit unless required by local law.

**4. INITIAL PAYMENT:** TENANT shall pay the first month rent of \$ 2,500 and the security deposit in the amount of \$ 2,500 for a total of \$ 5,000. Said payment shall be made in the form of cash or cashier's check and is required prior to occupancy.

**5. OCCUPANTS:** The premises shall not be occupied by any person other than those designated above as TENANT with the exception of the following minor persons:

\_\_\_\_\_



If LANDLORD, with written consent, allows for additional persons to occupy the premises, Any person staying 14 days cumulative or longer, without the LANDLORD'S written consent, shall be considered as occupying the premises in violation of this agreement.

**6. SUBLETTING OR ASSIGNING:** TENANT agrees not to assign or sublet the premises or any part thereof, without first obtaining written permission from LANDLORD. An assignment, subletting or license without the prior written consent of landlord shall, at landlords option, terminate this agreement. A consent by landlord to one such assignment, subletting or license shall not be deemed to be consent to any subsequent assignment subletting or license.

**7. JOINT AND INDIVIDUAL OBLIGATIONS:** If there is more than one Tenant, each one shall be individually and completely responsible for the performance of all obligations of Tenant under this Agreement, jointly with every other Tenant, and individually, whether or not in possession.

**8. UTILITIES:** TENANT shall pay for all utilities and/or services supplied to the premises with the following exception: gardner.

**9. PARKING:** TENANT allowed at total of 4 vehicle parking spaces, 2 in garage and 2 in driveway. Boat, RV and non-operational vehicles not permitted. TENANT may not assign, sublet, or allow any other person to use this space. The TENANT uses this space exclusively for parking of passenger automobiles. Only vehicles that are operational and currently registered in the State of California may park in this space. Any vehicle that is leaking any substance must not be parked anywhere on the premises.

**10. CONDITION OF PREMISES:** TENANT acknowledges that the premises have been inspected. Tenant acknowledges that said premises have been cleaned and all items, fixtures, appliances, and appurtenances are in complete working order. TENANT promises to keep the premises in a neat and sanitary condition and to reimburse, not to exceed one week landlord for any sums necessary to repair any item, fixture or appurtenance that needed service due to TENANT'S, or TENANT'S invitee, misuse or negligence. TENANT shall be responsible for repair or replacement of the garbage disposal where the cause has been a result of bones, grease, pits, or any other item that normally causes blockage of the mechanism.

**11. ALTERATIONS:** TENANT shall not make any alterations to the premises, including but not limited to installing aerials, lighting fixtures, dishwashers or other items without first obtaining written permission from LANDLORD. TENANT shall not change or install locks or wallpaper on said premises without LANDLORD'S prior written consent, TENANT shall not place placards, signs, or other exhibits in a window or any other place where they can be viewed by the community.

**12. LATE CHARGE:** Tenant shall pay a \$50.00 late fee for any rent not received by Landlord by the fifth (5<sup>th</sup>) day of the month. Tenant shall pay any returned check fees and associated charges. All delinquent rents or other expenses due from Tenant shall accrue interest at the rate of 15% per year until paid. All interest shall be deemed additional rents. Rent for the first month (or, if applicable, partial month) of the term shall be paid to Landlord at the time this agreement is executed. Rent for any partial month shall be prorated. Tenant shall not deduct or offset against rent unless expressly permitted by applicable law.

**13. NOISE, DISRUPTIVE ACTIVITIES, RESIDENTIAL USE:** TENANT or his/her guests and invitees shall not disturb, annoy, endanger or inconvenience neighbors, the LANDLORD or his agents, or workmen nor violate any law, nor commit or permit waste or nuisance in or about the premises. Premises are for the sole use as a personal residence by persons designated on this agreement as TENANTS. Tenant shall comply with any and all laws, ordinances, rules and orders of any and all governmental or quasi-governmental authorities affecting the cleanliness, use, occupancy and preservation of the premises.

**14. LANDLORD'S RIGHT OF ENTRY:** LANDLORD may enter and inspect the premises during normal business hours and upon written, reasonable advance notice of at least 24 hours to TENANT. LANDLORD is permitted to make all alterations, repairs and maintenance that in LANDLORD'S judgment is necessary to  
RentalLeaseAgreements.com