IN THE SUPREME COURT OF THE STATE OF NEVADA

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

Appellant,

vs.

ROBYN FRIEDMAN; AND DONNA SIMMONS,

Respondents.

No. 83967
Electronically Filed
Jul 25 2022 03:35 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

Respondents, Robyn Friedman and Donna Simmons, respectfully move this Court, pursuant to NRAP 31(b) for an extension of 30 days in which to file their answering brief and appendix.

Respondents' answering brief and appendix were originally due July 25, 2022. This is Respondents' first motion for extension of time. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of 30 days, Respondents' answering brief and appendix will be due on Wednesday, August 24, 2022.

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

- 1. Respondents have to respond to both the amicus curiae brief of Attorney for the Rights of Older Persons and Persons with a Physical Disability, an Intellectual Disability, or a Related Condition under NRS 427A and the answering brief.
- 2. Additionally, Appellant did not confer with Respondents for an appendix. Respondents will need to prepare their own appendix to demonstrate the full proceedings in the District Court.

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This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). For the foregoing reason, Respondents respectfully request a 30-day extension of time, until August 24, 2022, within which to file their answering brief and appendix.

Dated this 25th day of July 2022.

CLAGGETT & SYKES LAW FIRM /s/ Micah S. Echols

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' ANSWERING BRIEF AND APPENDIX (First Request) with the Nevada Supreme Court on the <u>25th</u> day of July 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

John P. Michaelson, Esq. Michaelson & Associates, Ltd.

1746 West Horizon Ridge Parkway, Henderson, Nevada 89012 (702) 731-2333 – Telephone Attorney for Respondents, Robyn Friedman and Donna Simmons

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<u>/s/ Anna Gresl</u>

Anna Gresl, an employee of CLAGGETT & SYKES LAW FIRM