

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

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Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENTS' ANSWERING BRIEF AND APPENDIX
(Second 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 Court previously granted a 30-day extension for Respondents to file their answering brief and appendix. 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 Friday, September 23, 2022.

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

1. Respondents' appellate counsel, Micah Echols, has spent the last few weeks conferring with co-counsel, identifying the needed documents for Respondents' appendix, and assembling the appendix which will be at least 16 volumes. Appellant did not confer regarding the possibility of a joint appendix, which necessitated Respondents preparing their own appendix.

2. Mr. Echols has also been assembling the joint appendix in Case No. 84345, *City Of Las Vegas v. 180 Land Co, LLC* C/W 84640, which consist of 129 volumes, and has been an enormous task reviewing documents. Mr. Echols recently joined these consolidated appeals.

3. In addition, Mr. Echols has been heavily involved in both pretrial motion practice and related trial preparation in Clark County Nevada, District Court in *Bellavance v. Valley Health System, L.L.C.*, A-20-813078-C, a case in which over 30 oppositions to motions in limine will be due September 9, 2022. Mr. Echols is also heavily involved in both pretrial motion practice and related trial preparation in Clark County Nevada, District Court in *Farris v. Rives, M.D.*, A-16-739464-C

in which several motions have been filed over the last several weeks on shortened time. The jury trial is scheduled to begin September 6, 2022, with jury selection.

4. Mr. Echols has worked diligently to meet the current filing deadline on the answering brief and appendix. The additional time is needed to finalize the appendix and answering brief and allow sufficient time for co-counsel and clients to review.

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 September 23, 2022, within which to file their answering brief and appendix.

Dated this 24th day of August 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 (Second Request)** with the Nevada Supreme Court on the 24th day of August 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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