

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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Sep 23 2022 02:40 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

Respondents, Robyn Friedman and Donna Simmons, respectfully move this Court, pursuant to NRAP 31(b) for an extension of two weeks 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 second extension of time to September 23, 2022. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of two weeks, Respondents' answering brief and appendix will be due on Friday, October 7, 2022.

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

1. Respondents' answering brief and appendix are largely complete. Respondents' answering brief responds to both LACSN's opening brief, as well as the supporting amicus brief, which combined is approximately 90 pages. LACSN did not confer with counsel for the Respondents regarding a joint appendix. Thus, Respondents created their own appendix, which is approximately 20 volumes.

2. Respondents and trial counsel for Respondents require additional time to complete their review. Accordingly, Respondents ask this Court to grant a new filing deadline for their answering brief and appendix until October 7, 2022.

3. Respondents' appellate counsel was not able to complete the answering brief and appendix within the current deadline, including the additional time for review, because he has been in continual hearings leading up to a three-week jury trial, *Farris v. Rives*, Case No. A-16-739464-C that was to begin on September 6, 2022. On the day before trial, the case settled on September 5, 2022. Due to the extreme amount of unexpected work for this jury trial (approximately nine

hearings between Supreme Court remand and the trial date, many on shortened time with briefing), Mr. Echols was deprived of the time he had set aside to work on this answering brief.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b)(3).

Dated this 23rd day of September 2022.

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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 (Third Request)** with the Nevada Supreme Court on the 23rd day of September 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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