

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

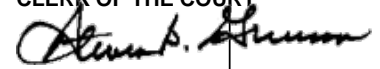
Electronically Filed
Sep 24 2022 01:07 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**RESPONDENTS' APPENDIX
Volume 19 (Nos. 3191–3219)**

John P. Michaelson, Esq.
Nevada Bar No. 7822
Peter R. Pratt, Esq.
Nevada Bar No. 6458
MICHAELSON LAW
1746 West Horizon Ridge Pkwy.
Henderson, Nevada 89012
(702) 731-2333 – Telephone
(702) 731-2337 – Facsimile
john@michaelsonlaw.com
peter@michaelsonlaw.com

Micah S. Echols, Esq.
Nevada Bar No. 8437
David P. Snyder, Esq.
Nevada Bar No. 15333
CLAGGETT & SYKES LAW FIRM
4101 Meadows Lane, Ste. 100
Las Vegas, Nevada 89107
(702) 655-2346 – Telephone
(702) 655-3763 – Facsimile
micah@claggettlaw.com
david@claggettlaw.com

Attorneys for Respondents, Robyn Friedman and Donna Simmons



NEO
MICHAELSON LAW
John P. Michaelson, Esq.
Nevada Bar No. 7822
Email: john@michaelsonlaw.com
Peter R. Pratt, Esq.
Nevada Bar No. 6458
Email: peter@michaelsonlaw.com
1746 West Horizon Ridge Parkway
Henderson, Nevada 89012
Ph: (702) 731-2333
Fax: (702) 731-2337
Attorneys for Robyn Friedman

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

NOTICE OF ENTRY OF ORDER
(FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER DENYING MOTION
TO STAY ORDER FOR REMOVAL OF GUARDIAN AND ORDER APPOINTING
SUCCESSOR GENERAL GUARDIAN OF THE PERSON AND ESTATE AND FOR
ISSUANCE OF LETTERS OF GENERAL GUARDIANSHIP)

To: Whom It May Concern:

Notice is hereby given that on June 29, 2022, a *Findings of Fact, Conclusions of Law, and Order Denying Motion to Stay Order for Removal of Guardian and Order Appointing Successor General Guardian of the Person and Estate and for Issuance of Letters of General Guardianship* was entered in the above-titled matter, a copy of said Order is attached hereto.

DATED: July 6, 2022.

MICHAELSON LAW

/s/ John P. Michaelson
John P. Michaelson, Esq.
Nevada Bar No. 7822
Peter R. Pratt, Esq.
Nevada Bar No. 6458

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) and NEFCR 9, the undersigned hereby certifies that on July 6, 2022 a copy of the (1) *Notice of Entry of Order (Findings of Fact, Conclusions of Law, and Order Denying Motion to Stay Order for Removal of Guardian and Order Appointing Successor General Guardian of the Person and Estate and for Issuance of Letters of General Guardianship)* and (2) *Findings of Fact, Conclusions of Law, and Order Denying Motion to Stay Order for Removal of Guardian and Order Appointing Successor General Guardian of the Person and Estate and for Issuance of Letters of General Guardianship* were e-served and/or 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:

Elizabeth Mikesell, Esq. Legal Aid Center of Southern Nevada emikesell@lacs.nv.gov <i>Attorney for Kathleen June Jones</i>	Robyn Friedman vgsfun@hotmail.com <i>Guardian</i>
Jennifer Bocek-Dobijanski jbocek-dobijanski@lacs.nv.gov <i>Assistant to Attorney for Kathleen June Jones</i>	
Jeffrey R. Sylvester, Esq. jeff@sylvesterpolednak.com Kelly L. Easton kellye@sylvesterpolednak.com <i>Co-Counsel for Guardian, Robyn Friedman, and Interested Party, Donna Simmons</i>	Kate McCloskey NVGCO@nvcourts.nv.gov LaChasity Carroll lcarroll@nvcourts.nv.gov Sonja Jones sjones@nvcourts.nv.gov

/ / /

/ /

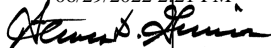
/

<p>Elizabeth Brickfield DAWSON & LORDAHL PLLC ebrickfield@dlnevadalaw.com</p> <p>Melissa R. Romano mromano@dlnevadalaw.com</p> <p><i>Guardian Ad Litem for Kathleen June Jones</i></p>	<p>Kimberly Jones flyonthewall2you@gmail.com</p>
<p>Monica L. Gillins mlg@johnsonlegal.com</p>	<p>Scott Simmons scott@technocoatings.com</p>
<p>Cameron Simmons Cameronnnscoott@yahoo.com</p>	<p>Perry Friedman friedman@cs.stanford.edu</p>
<p>Donna Simmons donnamsimmons@hotmail.com</p>	<p>Ty Kehoe TyKehoeLaw@gmail.com</p>
<p>Kathleen June Jones 1315 Enchanted River Drive Henderson, NV 89012 <i>Protected Person</i></p>	
<p>Teri Butler 586 N. Magdalena Street Dewey, AZ 86327</p>	<p>Courtney Simmons 765 Kimbark Avenue San Bernardino, CA 92407</p>
<p>Jen Adamo 14 Edgewater Drive Magnolia, DE 19962</p>	<p>Jon Criss 804 Harkness Lane, Unit 3 Redondo Beach, CA 90278</p>
<p>Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832</p>	<p>Tiffany O'Neal 177 N. Singing Wood Street, Unit 13 Orange, CA 92869</p>

MICHAELSON LAW

/s/ Weston Robinson

Employee of Michaelson Law


CLERK OF THE COURT

FFCL

John P. Michaelson, Esq.
Nevada Bar No. 7822
john@michaelsonlaw.com
Matthew D. Whittaker, Esq.
Nevada Bar No. 13281
matthew@michaelsonlaw.com
MICHAELSON LAW
1746 W. Horizon Ridge Parkway
Henderson, Nevada 89012
Ph: (702) 731-2333
Fax: (702) 731-2337
*Attorneys for Successor Guardian,
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: 01/27/2022
Time of Hearing: 11:30 a.m.

**FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER DENYING
MOTION TO STAY ORDER FOR REMOVAL OF GUARDIAN AND ORDER
APPOINTING SUCCESSOR GENERAL GUARDIAN OF THE PERSON AND
ESTATE AND FOR ISSUANCE OF LETTERS OF GENERAL GUARDIANSHIP**

THIS MATTER came before the Court on January 27, 2022, for a hearing on the following:

1. The Protected Person, Kathleen June Jones' ("Protected Person" or "Ms. Jones") Motion to Stay Order for Removal of Guardian and Order Appointing Successor General Guardian of the Person and Estate and for Issuance of Letters of General Administration filed December 22, 2021 ("Motion to Stay"); and

2. The Guardian Robyn Friedman ("Robyn") and Interested Party Donna Simmons' ("Donna") Opposition to Motion to Stay Order for Removal of Guardian and Order Appointing

1 Successor General Guardian of the Person and Estate and for Issuance of Letters of General
2 Guardianship.

3 The Court considered the pleadings and papers on file herein, heard oral arguments from
4 counsel and interested parties at the hearing, examined the evidence, and has been fully informed
5 on the matter. It appears to the Court that proper notice has been given to all interested parties.
6 The Court hereby finds, concludes, and orders as follows:

7 **I. APPEARANCES**

8 3. Elizabeth Mikesell, Esq. on behalf of Maria L. Parra-Sandoval, Esq., court-
9 appointed counsel for the Protected Person.

10 4. John P. Michaelson, Esq. of Michaelson Law on behalf of the Successor
11 Guardian, Robyn Friedman, and Interested Party, Donna Simmons.

12 5. Successor Guardian, Robyn Friedman, along with Ms. Jones and Robyn's
13 husband Perry Friedman.

14 6. Former Guardian, Kimberly Jones ("Kimberly").

15 7. Supreme Court Guardianship Compliance Financial Forensic Specialist, Sonia
16 Jones.

17 8. Ty Kehoe, Esq. on behalf of non-interested parties Dick and Kandi Powell.

18 9. Protected Person's son-in-law, Jack Butler.

19 **II. FINDINGS OF FACT**

20 10. On September 19, 2019, Robyn and Donna filed a petition for, among other relief,
21 a temporary and general guardianship for Ms. Jones, alleging Ms. Jones was: (1) unable to care
22 for herself medically, financially, and legally without assistance; and (2) harmed by other
23
24
25

1 individuals related by marriage that were ignoring Kimberly as Ms. Jones' designated agent in
2 Ms. Jones' Financial and Healthcare Powers of Attorney ("POA") and exploiting Ms. Jones.

3 11. The alleged exploitation included: (a) transferring Ms. Jones' ownership interest
4 in her home to the alleged exploiters for far less than market value, (b) the same individuals
5 forcibly preventing Kimberly from acting as Ms. Jones' attorney-in-fact both for financial and
6 medical decisions and not bringing Ms. Jones home from a visit to see them in Arizona, (c) then-
7 husband cancelling Ms. Jones' medical appointments, (d) the initiation of eviction proceedings
8 against Kimberly who had moved into Ms. Jones' home to care for her, and (e) missing funds
9 from Ms. Jones' bank accounts; all while medical professionals informed Robyn and Donna that
10 Ms. Jones required 24/7 medical care and lacked testamentary and contractual capacity. For these
11 reasons, this Court granted and later extended the temporary guardianship.

12 12. At the time of her appointment, this Court fully vetted Robyn as guardian.
13 Robyn's petition for temporary and general guardianship included all factors required by statute
14 about her qualifications to act as guardian and this Court found that she was qualified to be
15 temporary guardian.

16 13. Robyn and Donna provided medical evidence and evaluations from Dr. Gregory
17 Brown showing that Ms. Jones is very limited in her ability to care for herself, manage her affairs,
18 and in her process decision making.

19 14. Dr. Brown stated that he reviewed a 2016 Mini-Cog examination wherein Ms.
20 Jones scored a 1, "a score indicative of a dementing condition." Dr. Brown also reviewed a
21 February 17, 2016, record that indicated that Ms. Jones was diagnosed with Alzheimer's
22 Dementia and a September 5, 2019, letter from Dr. Sabbagh that said Ms. Jones "had a
23 degenerative neurological condition which led her to be unable to manage her own affairs
24 including medical, financial, and legal decisions."
25

1 15. Dr. Brown found that Ms. Jones suffered from “profound deficits in long-term
2 memory and general recall of overall life historical data, with a general paucity of detail.”

3 Specifically, Dr. Brown found that even back in 2019, Ms. Jones:

- 4 a. Was unable to provide basic information about her life including the number of
5 marriages that she had, how many children and grandchildren she has, the location
6 or title of any of the jobs she held as an adult;
7 b. Unable to understand paying her bills independently;
8 c. Had an inaccurate assessment of both the nature and extent of her estate;
9 d. Was completely unaware of her own medical history and her husband’s medical
10 condition; and
11 e. Was unaware of her prescribed medications and the reasons for them.

12 16. Dr. Brown concluded, “[t]his lack of information would prevent her from being
13 able to reasonably process decision making in multiple domains in life.”

14 17. Kimberly also provided medical evidence that Ms. Jones lacked capacity to care
15 for herself and manage her medical, financial, and legal decisions. In addition, Kimberly has
16 acknowledged several times, and in multiple pleadings, Ms. Jones’ profound lack of capacity
17 and inability to make choices on her own.

18 18. Kimberly opposed and objected to the need for a guardianship, and alternatively,
19 counter-petitioned to be general guardian. However, the Court appointed Kimberly as guardian
20 of the person and estate of Ms. Jones on October 15, 2019, because: 1) Ms. Jones preferred
21 Kimberly to be appointed guardian; 2) Kimberly finally agreed to serve as guardian; and 3)
22 Robyn and Donna voluntarily stepped aside to follow Ms. Jones’ preference once a guardianship
23 was initiated to ensure transparency and security in the care of Ms. Jones’ person and estate.

24 19. However, following Kimberly’s appointment as guardian, Robyn and Donna
25 began claiming that Kimberly was violating the Protected Person’s rights including allegations
that Kimberly restricted visits and communication between the Protected Person and her
immediate family in violation of NRS 159.332.

1 20. On December 30, 2020, Robyn and Donna filed a Verified Petition for
2 Communication, Visits, and Vacation Time with Protected Person (“Visit Petition”). In the Visit
3 Petition, Robyn and Donna stated that they were forced to bring the Visit Petition “to compel
4 Kimberly, as guardian, to be more humane” and “provide the same kind of logistical support to
5 Ms. Jones’ family as Kimberly provides to Ms. Jones’ medical professionals, legal aid attorney,
6 this Court, friends, neighbors, gardeners, dry cleaners, the veterinarian and the dog groomer.”
7 Robyn and Donna requested a “course correction for Kimberly, as the guardian of [the Protected
8 Person], to help Kimberly follow through with protecting [the Protected Person’s] right, among
9 others, as recognized in the Protected Person’s Bill of Rights, to ‘receive telephone calls and
10 personal mail and have visitors.’” Robyn and Donna had and have no “desire to compel [the
11 Protected Person] to visit with them. Rather, they seek a routine or series of windows of
12 opportunity so that all sides can plan to be available to accomplish the visits” if and only if Ms.
13 Jones wants the visits to happen.

14 21. The Visit Petition provided numerous examples and evidence of how Kimberly
15 used her “just call mom” doctrine to restrict visits and communication with the Protected Person.
16 The examples of the “just call mom” doctrine usually began when Ms. Jones voiced her desire
17 to visit with Robyn on the phone. “When Robyn asks when they can meet, [the Protected Person]
18 hesitates and then says she will call Robyn to set something up. However, invariably, [the
19 Protected Person] does not call, possibly because she simply does not remember to do so. When
20 Robyn appeals to Kimberly for assistance in coordinating the meetings, Kimberly typically
21 ignores the communications for a time and then eventually tersely refers Robyn back to their
22 mother . . . to make the arrangements directly as if [the Protected Person] realistically can carry
23 through on any planning to set up a visit – continuing the cruel cycle.”

24 22. Moreover, Kimberly did not adhere to a prior agreement hammered out at great
25 cost to Robyn and Donna through numerous communications between counsel for Robyn and

1 Donna, and counsel for Kimberly, including in-person informal settlement conferences. This
2 agreement was hammered out to secure what should have been obvious and intuitive —
3 Kimberly's assistance with communication and visits with Ms. Jones. Some of Kimberly's
4 failures included disabling FaceTime on Ms. Jones' phone, yelling at Ms. Jones and Robyn in
5 front of Robyn's child about whether Ms. Jones wanted to go on a vacation with Robyn, and
6 Kimberly taking Ms. Jones to Arizona on the exact dates in July 2020 that were set apart in the
7 agreement for Robyn to take Ms. Jones on vacation with no advance notice to Robyn that
8 Kimberly was effectively precluding the pre-planned trip. Kimberly did the same thing to Donna
9 — took Ms. Jones to Arizona at the exact time when Kimberly knew that Donna, who lives in
10 California, was going to travel to Las Vegas to see Ms. Jones without notifying Donna until
11 Donna and other members of the protected person's family were already in Las Vegas.

12 23. Robyn and Donna provided further evidence showing that Kimberly restricted
13 visits and communication between Ms. Jones and Robyn on October 10, 2020, with a last-minute
14 unplanned offer from Kimberly to drop Ms. Jones off at Robyn's home. Desperate to see her
15 mother, Robyn dropped everything she was doing with her business that day to see Ms. Jones
16 with no notice only to have Kimberly stop responding to text messages and resort to Kimberly's
17 "just call mom" doctrine so that the visit was very limited and short by the time Kimberly finally
18 relented and allowed Robyn to see her mother that day. Kimberly's "just call mom" doctrine also
19 restricted visits on October 13, 2020, October 30, 2020, December 3, 2020, and December 14,
20 2020. Kimberly would demand family members to coordinate all their visits directly with Ms.
21 Jones who could not do so. When family members would occasionally get very brief moments
22 on the phone with Ms. Jones, Ms. Jones would invariably say she wants to visit, but to call back
23 later. When family members repeatedly tried calling later, Ms. Jones would say the same things
24 and the cycle would repeat. Kimberly would not help to break the cycle. She would say "just
25 call mom."

1 24. Robyn and Donna alleged that Kimberly coordinates visits between Ms. Jones
2 and her other daughter Teri Butler who lives in Arizona, with whom Kimberly agrees, but other
3 family members get last-minute notice, if any at all, terse, vague text messages, and short phone
4 calls. Clearly Kimberly was able to make appointments with numerous individuals and
5 institutions, especially some family members with whom she agreed. Obviously, calendars were
6 utilized, and a certain level of communication was employed between Kimberly and these
7 individuals and institutions to accomplish the visits or appointments. But when it came to Robyn
8 and Donna, Kimberly refused to assist Ms. Jones in seeing her daughters.

9 25. Ms. Jones' court-appointed legal aid attorney filed an Opposition to the Visit
10 Petition that did not acknowledge the myriad of allegations that Kimberly was restricting visits
11 and communication in violation of Ms. Jones' rights. Instead, the Opposition stated that Ms.
12 Jones did not "want an imposition of anything that looks like a visitation schedule." Court-
13 appointed counsel's logic was that "[a]n additional communication tool will only isolate the
14 Protected Person from her own family." Court-appointed counsel made these representations
15 even while acknowledging a "never-ending tug-of-war communication battle" among Ms. Jones'
16 daughters wherein the daughters should be "sent to mandatory mediation to work out their
17 communication problems" because Ms. Jones has paid "such a high price" for the battle.
18 Moreover, court-appointed counsel acknowledged that "the only issue here is that grown women
19 refuse to work together with what should be simple logistics for setting up communication when
20 the Protected Person wishes to see a family member." Curiously, court-appointed counsel
21 remained adamant that the court should take no action to resolve the "tug-of-war communication
22 battle" even in light of the high price Ms. Jones was and is paying. Court-appointed counsel did
23 not address the many specific allegations of abuse and isolation by Kimberly.

24 26. Kimberly also filed an Opposition to the Visit Petition that asked the Court not to
25 impose any "time-consuming" procedures on her. Like court-appointed counsel, Kimberly did

1 not address Robyn and Donna’s detailed claims of abuse and isolation, but instead swept aside
2 the numerous allegations *en masse* by contending that Robyn and Donna did not provide any
3 evidence to support the arguments that Kimberly restricted access to Ms. Jones.

4 27. In Reply, Robyn and Donna reiterated that they did not want Ms. Jones “to do
5 things that she does not want to do” or “disregard[] [her] wishes.” But rather, they sought simple
6 logistics including a framework of preset opportunities to assist Ms. Jones “when she expresses
7 her desires to her daughters that she wants to see them.” Robyn and Donna have always
8 maintained that Ms. Jones should never be forced to visit with them or anyone else.¹ Robyn and
9 Donna also alleged that Kimberly was playing favorites—if a family member agreed with
10 Kimberly’s position that the guardianship needed to terminate and care of Ms. Jones should
11 revert back to being handled by Kimberly pursuant to a POA, and that Kimberly need not provide
12 an accounting and that no investigation of Kimberly’s conduct should happen, then the family
13 member received Kimberly’s assistance with visitation and access to Ms. Jones, but family
14 members that questioned or disagreed with Kimberly did not get any assistance at all—
15 effectively weaponizing Kimberly’s position as guardian against her own family.

16 28. Moreover, the Reply detailed a “strong disconnect between reality and what
17 counsel represents” to the Court. The Reply provided verified statements and photographs
18 showing that Ms. Jones enjoys the time she spends with Robyn’s family. The Reply also
19 provided a transcript from a recording of Ms. Jones struggling and failing to use her own cell
20 phone to call Kimberly – showing Ms. Jones likely cannot even call Robyn or Donna without
21 assistance, let alone initiate and coordinate calendaring of visitation with the many members of
22 her family. The Reply further alleged that statements from Ms. Jones’ counsel and Kimberly are
23 examples of the disconnect between their assertions that Ms. Jones can fully handle her own
24

25 ¹ In virtually every hearing, both Kimberly and Ms. Jones’ court-appointed counsel have claimed
that Robyn and Donna are seeking to impose visitation on Ms. Jones against her wishes.

1 affairs and the reality of Ms. Jones condition. “For example, Ms. Parra-Sandoval repeatedly
2 states to the Court that [the Protected Person] continues to forget that she lost [her home] and
3 that Ms. Parra-Sandoval informed this Court that she is the one that informed [the Protected
4 Person] that her husband died.” Due to the disconnect, Robyn and Donna asked the District Court
5 to utilize its other available tools to investigate allegations of isolation of Ms. Jones by the
6 guardian.

7 29. At a hearing on February 11, 2021, the Court acknowledged the disconnect
8 between Ms. Jones’ counsel’s representations and Robyn and Donna’s representations. Court-
9 appointed counsel continued² to represent to this Court that no further investigation was
10 necessary because Ms. Jones is able to direct her in these legal proceedings and does not want
11 any schedule or framework for visitation. At the hearing, Robyn and Donna’s counsel argued
12 that Robyn and Donna tried the “just call June train” and “it doesn’t work. She does not have the
13 ability to schedule and call back on her own.” Further, it was explained to the Court that Ms.
14 Jones’ other daughter Teri Butler “gets visitation” because “Kimberly arranged it. She facilitated.
15 She helps out with that like a normal person.”

16 30. Additionally, Robyn and Donna stated that the Protected Person’s counsel’s
17 position (including the pending appeal in Case No. 81799) undermined and was in opposition to
18 the position taken by then guardian, Kimberly Jones, in the related civil case action to recover
19 the Protected Person’s home. The undersigned counsel contended that any appeal in Case No.

21 ² It’s one thing for court-appointed counsel to adhere to and advocate a client-directed model.
22 But in the context of a guardianship proceeding with a protected person who has been shown to
23 have limitations on capacity, it’s another thing to adamantly oppose the introduction of any other
24 eyes and ears or methodologies to assist the Court, or to oppose the introduction of evidence
25 such as missing text messages or criminal records that could show the protected person’s rights
may be being violated.

1 81799 should have been brought and directed by the guardian (Kimberly Jones), not the legal
2 aid attorney appointed to protect Ms. Jones' interests. However, the guardian did not bring the
3 appeal because she recognized that saying that [the Protected Person] can direct [an] appeal
4 factors into whether the Protected Person can consent to her house being transferred. In other
5 words, the court-appointed counsel's contentions that Ms. Jones can and has been fully
6 understanding and directing the various appeals in this matter and that she can also fully
7 appreciate who her family members are and facilitate complex calendaring and visitation on her
8 own without assistance from the guardian, undermines Ms. Jones' position in the related civil
9 court litigation that her paid for property was unlawfully taken from her because she lacked the
10 capacity to understand and get help to stop the transfer of the property for far less than market
11 value.

12 31. Around Mother's Day 2021, Robyn and Donna filed a Petition for a court-ordered
13 Mother's Day visit ("Mother's Day Petition") to allow Robyn, Donna, and other family members
14 to have a day-long celebration with Ms. Jones. The Mother's Day Petition alleged that the order
15 was necessary because Kimberly had once again precluded and restricted Robyn and Donna from
16 visiting with their mother around Easter, a month earlier, while simultaneously relocating their
17 mother out of her Las Vegas home to Anaheim, California before this Court had authorized the
18 move.

19 32. On May 5, 2021, Ms. Jones' court-appointed legal aid attorney filed a Petition to
20 Approve her Proposed Visitation Schedule. The proposed visitation schedule included: any
21 visitors who wanted to see Ms. Jones could only do so between 10:00 a.m. and 12:00 p.m. on
22 Fridays with only one visitor per hour. If family members wanted to see Ms. Jones but could not
23 do so during the proposed two-hour time block, then they were to text Kimberly by Thursday
24 morning wherein Kimberly would help Ms. Jones with a phone call during the Friday time block
25 to the family member. Any visitors had to confirm with the guardian 24 hours before the visit.

1 There were to be no more overnight vacations with Ms. Jones. Visits were only to take place at
2 Ms. Jones' home (or volunteered Donna's home as a potential second place for visits). At a later
3 evidentiary hearing, every witness including Kimberly testified Ms. Jones could not have
4 conceived such an unworkable visitation schedule.

5 33. In response to the serious allegations raised in the pleadings and various hearings,
6 this Court implemented multiple tools to investigate the allegations that the guardian was
7 restricting visits between the protected person and her family in violation of NRS 159.332 and
8 the Protected Person's Bill of Rights—NRS 159.328.

9 34. At the February 11, 2021, hearing, this Court appointed a Guardian ad Litem and
10 an investigator due to the disconnect between the medical reports and the statements from Ms.
11 Jones' court-appointed counsel, stating "I haven't been provided any evidence or suggestion that
12 [Ms. Jones] is able to execute, facilitate, plan, schedule time with [Robyn and Donna]." Further,
13 "we have heard that she loves all of her daughters; that she wants to direct her day." The Court
14 stated that it was "not considering necessarily a visitation schedule that is an order that the
15 protected person participate in or attend, but a scheduled opportunity to facilitate visitation if the
16 protected person [would] like to take advantage." To do that, the Court needed more information
17 to determine whether things changed since the appointment of the guardianship to "make a
18 determination about how much facilitation, how much prompting, how much encouragement,
19 scheduling and participating and execution is appropriate given the protected person's wants."

20 35. On February 12, 2021, the Court entered its order appointing the State
21 Guardianship Compliance Officer to meet with all parties about the "visitation, time together,
22 communications, and their needs, requests, and concerns regarding the Protected Person."
23 Further, the Court asked the investigator to review all records of conversations and text messages
24 "to assist the Court in determining if the Guardian has been acting unreasonably under statute."
25

1 36. On February 16, 2021, the Court entered its order appointing Elizabeth Brickfield,
2 Esq. as the guardian ad litem for Ms. Jones. The Court asked the guardian ad litem to speak with
3 the protected person and her children about “whether the Guardian has an obligation to facilitate,
4 prompt, encourage, plan, schedule, and/or create an environment that promotes an opportunity
5 for continued communication between Protected Person and her adult daughters based upon the
6 current level of care and needs of the Protected Person.”

7 37. On March 29, 2021, the Guardian ad Litem provided her report and stated that
8 Ms. Jones wants to visit and communicate with her family, but “lacks the ability to manage,
9 initiate or plan these communications or visits.” Specifically, “Ms. Jones’ mental decline is more
10 advanced than her physical decline, that she lacks the ability to comprehend or answer compound
11 questions and that she lacks decision making ability or schedule management.” Although Ms.
12 Jones expressed a desire not to have a schedule, Ms. Brickfield believed it is in Ms. Jones’ best
13 interest to have a caregiver or guardian who encourages and facilitates such visiting because Ms.
14 Jones lacks the ability to initiate telephone calls or schedule and/or actually carry out visits.

15 38. On May 12, 2021, the Court scheduled an evidentiary hearing upon determining
16 that “there remain issues of fact that must first be determined by the Court at an Evidentiary
17 Hearing before the Court can enter an order relative to Robyn Friedman and Donna Simmons’
18 request for communication, access, and time with their mother, the Protected Person, pursuant
19 to NRS 159.332 through NRS 159.337, and NRS 159.328.” The Court ordered all parties to file
20 a pre-trial memorandum that focused on legal points and authorities.

21 39. The court-appointed attorney for the Protected Person did not object to or petition
22 for clarification of the scope of the evidentiary hearing or request that Ms. Jones not be required
23 to testify at the evidentiary hearing. Instead, the legal aid attorney for Ms. Jones filed a Pre-Trial
24 Memo that continued to object to a visitation schedule but did not object to the evidentiary
25 hearing or the scope thereof. Instead, court-appointed counsel filed a Writ Petition with the

1 appellate courts on the eve of the evidentiary hearing and a Motion to Stay the evidentiary
2 hearing. Counsel contended that the stay was necessary to ensure that Ms. Jones would not be
3 subjected to cross-examination and incur additional attorney's fees.

4 40. On June 7, 2021, this Court entered an Order Denying Petition for Stay. The Court
5 stated that the Protected Person's court-appointed counsel asked the Court to "order a rather
6 complicated and specific schedule." Moreover, the Court took issue with court-appointed
7 counsel's "misleading" assertions that the Visit Petition was "simply a request for visitation
8 orders." Instead, "the allegations are that the Guardian has restricted communication, visitation
9 and/or interaction between the Protected Person and two of her daughters in violation of NRS
10 159.334." The Court was concerned that the Writ Petition "fails to reference the ramifications of
11 a finding of restriction or refer to the statutory process allowed to a relative who believes access
12 has been restricted." The Court noted that the Motion to Stay concerned whether "the Court
13 might canvass the Protected Person or the Court might allow the daughters to cross-examine
14 their mother during the Evidentiary Hearing" but the court-appointed counsel's worries had "not
15 been properly raised before the District Court" and "would have been an appropriate issue to be
16 raised in the additional legal briefs the Court previously ordered."

17 41. The Court proceeded with the evidentiary hearing on June 8, 2021. Ms. Jones'
18 court-appointed counsel did not have Ms. Jones appear and objected to Ms. Jones testifying at
19 the hearing even though it could have been an opportunity for the Court to hear the Protected
20 Person's wishes first-hand. The Court ruled that Ms. Jones would not be forced to attend or
21 testify at the hearing.

22 42. The Court also had to investigate Kimberly's repeated failure to meet the statutory
23 requirements for the first annual accounting that was initially due in December 2020. The initial
24 Accounting submitted had numerous deficiencies. Over the last year, this Court provided
25 Kimberly numerous opportunities to correct the deficiencies. She failed to do so. Each

1 supplement continually failed to meet the statutory requirements and alleviate concerns from the
2 Guardianship Compliance Office. This was doubly concerning because Kimberly holds a
3 master's degree in geriatric care and professes to have been involved in hundreds of custody
4 and/or guardianship cases in the state of California. She of all people should know what is
5 expected of a guardian.

6 43. Subsequently, after failing repeatedly to complete her Accounting, this Court
7 ordered Kimberly to provide all receipts to support the Accounting. She did not. Instead, she
8 turned over certain bank account statements. The Guardianship Compliance Office noted many
9 issues with the latest supplemental accounting including thousands of dollars of transactions that
10 the investigator could not confirm were for the benefit of Ms. Jones (for example, thousands of
11 dollars paying a Citibank credit card not in Ms. Jones' name and over \$8,000 in cash
12 withdrawals).

13 44. Due to the serious nature of what Kimberly was doing, Robyn asked for this Court
14 to *sua sponte* remove Kimberly based on the record before the Court including numerous
15 pleadings and filings, many of which were from Kimberly herself, such as the seriously
16 inadequate accounting attempts. On April 5, 2021, Robyn and Donna filed an Opposition to
17 Kimberly's Petition to Relocate Protected Person and Transfer Guardianship. In that Opposition,
18 Robyn and Donna detailed how Kimberly pre-maturely relocated Ms. Jones out of state to
19 Anaheim, California, without this Court's authorization and willingly chose not to provide notice
20 to interested parties in violation of Nevada law. Concerns that Kimberly would do this were
21 raised in previous hearings and Kimberly was admonished not to move June out of state unless
22 and until authorized. The Opposition went into great detail about how the unauthorized
23 relocation of Ms. Jones happened, how Robyn and Donna learned of it, and was supported by
24 emails between counsel and statements from neighbors in Anaheim that they had spoken to
25 Kimberly's boyfriend Dean Loggans ("Dean") during the weekend in question and that Dean

1 confirmed that he and Kimberly were moving into the home. Kimberly's boyfriend Dean has
2 had altercations with several family members and his presence in Ms. Jones' home is a major
3 stumbling block to family visiting with their mother and grandmother. The Opposition further
4 discussed how Kimberly has failed since being appointed guardian to provide the information
5 required for a budget, inventory, and care plan, and that the Petition to Relocate failed to provide
6 the statutorily required information. Based on Kimberly's unlawful conduct, and ongoing
7 unwillingness and/or inability to act properly as a guardian, Robyn and Donna asked this Court
8 to consider exercising its power and authority to *sua sponte* remove Kimberly as guardian based
9 upon the record before the Court. Court-appointed counsel for the Protected Person did not file
10 anything in response to the Opposition including its request to remove Kimberly.

11 45. In the Mother's Day Petition, Robyn and Donna requested that if Kimberly failed
12 to allow the visit to occur, that the Court should also consider removing Kimberly as guardian.
13 Court-appointed counsel for Ms. Jones did not file an opposition or response to the Mother's
14 Day Petition including its request to remove Kimberly.

15 46. On June 18, 2021, Robyn and Donna filed their Closing Brief for the Evidentiary
16 Hearing wherein they requested that this Court consider removal pursuant to NRS 159.185 if
17 this Court was persuaded that Kimberly weaponized her power as guardian or in other ways
18 harmed Ms. Jones or depleted Ms. Jones' estate. Court-appointed counsel for Ms. Jones never
19 filed anything in response to the request to remove Kimberly.

20 47. On July 15, 2021, Robyn and Donna filed an Objection to Kimberly's Accounting
21 and First Amended Accounting. Again, Robyn and Donna asked this Court to *sua sponte* remove
22 Kimberly as guardian for her failures to adhere to her duties, her dishonesty with the Court, Ms.
23 Jones, and interested parties, and her absolute flouting of the rules and laws governing
24 guardianship, all of which was harming the June and causing great expense to all the parties. The
25 Protected Person's court-appointed counsel filed nothing in response to this request. Indeed,

1 court-appointed counsel for the Protected Person has taken virtually no action or stance against
2 Kimberly in this matter and even advised the Court against allowing Robyn and Donna to
3 produce additional text messages when it was discovered that Kimberly had deleted them from
4 her doctored disclosures to the Court and the guardianship compliance office.

5 48. Since being appointed as Successor Guardian, Robyn had Dr. Brown re-evaluate
6 Ms. Jones on December 28, 2021. Dr. Brown found that Ms. Jones' mental situation has only
7 further declined since 2019. Dr. Brown stated in his latest report:

8 [Ms. Jones] demonstrated an additional decline in mental functioning as
9 demonstrated by a 2 point addition drop in the Folstein MMSE. Her long term
10 memory demonstrated marked deterioration over the past two years. Her ability to
11 correctly identify current responsibilities [bill paying], medications, medical
12 conditions, financial resources, etc. is greatly diminished and largely not accurate.
Although she may assent to various activities, her current functioning would
suggest the inability to reasonably [weigh] the costs and benefits of many decisions.
MMSE likely over represents ability based upon other deficits.

13 49. Dr. Brown further concluded that Ms. Jones "has a sufficient loss of executive
14 function resulting in a barrier to meaningful understanding or rational response," "is unable to
15 execute on desires, preferences, or stated goals, preventing the ability to pursue [Ms. Jones'] own
16 best interest," and "is unable to make or communicate decisions to such an extent that [Ms.
17 Jones] lacks the ability to meet essential requirements for physical health, safety, or self-care
18 without proper assistance." Dr. Brown opined that Ms. Jones requires 24-hour supervision and
19 either requires substantial or total care in almost every aspect of her life from self-care to finances
20 to medical care. Dr. Brown opined that Ms. Jones lacks capacity to enter into a contract, financial
21 commitment, or lease arrangement, make or modify a will or power of attorney, or participate in
22 mediation.

23 50. Ms. Jones' mental status has deteriorated so far that she told Dr. Brown that she
24 has never heard of Legal Aid Center of Southern Nevada and stated, "I have no attorney." Ms.
25 Jones further guessed that she speaks with an "Anna Marie" from time to time. Ms. Jones

1 reported to Dr. Brown that she has no idea what appeals are in general or in specific relative to
2 her case. She stated having no idea who Elizabeth Brickfield is or ever meeting with her. *Id.* She
3 further stated having never met or seen Dr. Brown before in the past.

4 51. Ms. Jones believes she is still paying all her own bills on her own though she
5 could not state what bank she uses or what bills she pays. She has no idea how much money she
6 has and states that her Anaheim home is only valued at \$125,000.

7 52. Ms. Jones' lack of capacity is so profound that she denied taking any medications
8 and does not think she has any medical conditions even though she currently takes nine
9 medications per day for various medical conditions.

10 53. Dr. Brown opined that the Protected Person lacks capacity to "provide reasonable
11 detailed responses to questions" and has an "inability to hold information in awareness long
12 enough to weigh the risks, the benefits, and outcomes of decisions." Dr. Brown concluded that
13 the Protected Person "would have less ability to defend her own interests from the interests of
14 others and thus have increased susceptibility to undue influence of others."

15 III. CONCLUSIONS OF LAW

16 54. In deciding whether to issue a stay, the Court is to generally consider the
17 following factors:

- 18 (1) whether the object of the appeal or writ petition will be defeated if the stay or
19 injunction is denied;
20 (2) whether appellant/petitioner will suffer irreparable or serious injury if the stay
21 or injunction is denied;
22 (3) whether respondent/real party in interest will suffer irreparable or serious injury
23 if the stay or injunction is granted; and
24 (4) whether appellant/petitioner is likely to prevail on the merits in the appeal or
25 writ petition.

See NRAP 8(c).

**NRAP 8(c)(1), Whether the object of the appeal or writ petition
will be defeated if the stay or injunction is denied**

1 55. Denying the requested stay will not defeat the object of court-appointed counsel's
2 appeal. Under the guise of "due process" and the guardianship Bill of Rights, the object of
3 court-appointed counsel's appeal is to limit this Court's discretion in appointing Guardian ad
4 Litem to represent the best interests of protected persons, scheduling evidentiary hearings, and
5 investigating allegations that court-appointed guardians are violating Nevada law, isolating the
6 protected person, or violating a protected person's Bill of Rights. The object of the appeal has
7 little to do with the Protected Person and everything to do with a misguided attempt to change
8 the guardianship statutes by establishing a pattern or expectation that once a legal aid attorney
9 makes a representation of a protected person's wishes, all further inquiry, even by the Court,
10 must cease. Again, the object of the appeal (assuming it really is focused on due process) will
11 not be defeated if this Court denies the stay. To the contrary, court-appointed counsel has had
12 many opportunities to object to the removal of Kimberly but has simply chosen not to.

13 **NRAP 8(c)(2), Whether appellant/petitioner will suffer irreparable**
14 **or serious injury if the stay or injunction is denied**

15 56. Neither court-appointed counsel, nor Ms. Jones will suffer irreparable harm if the
16 requested stay is denied. Since Robyn has been Successor Guardian, Ms. Jones has been thriving
17 and doing very well. Robyn reports that Ms. Jones had a Christmas celebration with more of her
18 family around her than she would have had with Kimberly as guardian – certainly more of a
19 Christmas celebration than she would have had had this Court granted counsel's petition for a
20 Friday morning only visitation schedule. The Protected Person was also able to celebrate
21 Donna's birthday with Donna and the rest of her family. The Court has been informed that Ms.
22 Jones was smiling and having a good time during those celebrations. Additionally, Robyn
23 learned that Kimberly was giving the Protected Person medications off schedule from what the
24 doctors prescribed. Robyn corrected Kimberly's medication mistakes and the Protected Person
25

1 is receiving the appropriate medications at the appropriate intervals. The Protected Person does
2 not refute or deny Robyn's reports to the Court.

3 **NRAP 8(c)(3), Whether respondent/real party in interest will suffer**
4 **Irreparable or serious injury if the stay or injunction is granted**

5 57. Guardian, Robyn, and the Protected Person will suffer irreparable or serious
6 injury if the requested stay is granted. Since being appointed as successor guardian, Robyn has
7 incurred significant cost and time taking over the guardian duties and responsibilities from
8 Kimberly. She spent a significant amount of time in California away from her husband and son.
9 She spent a significant amount of time and money caring for the Protected Person, coordinating
10 in-home care, and beginning to undo the mess Kimberly created and left behind (including
11 medications and finances). Robyn has completely taken over all of the duties and responsibilities
12 for caring for the Protected Person. Accordingly, both the Protected Person and Robyn would
13 suffer extreme irreparable harm if the stay were granted and the guardianship were required to
14 go back to Kimberly's very poor financial and medical management.

15 58. Also, Kimberly has not filed a joinder to the request for stay and has not asked in
16 any way to return to being guardian. It is unknown whether Kimberly even wants or agrees to
17 resume her responsibilities as guardian. Granting the stay could simply place an unwilling
18 guardian back into a position of responsibility for the Protected Person, causing more harm to
19 the Protected Person.

20 **NRAP 8(c)(4), whether appellant/petitioner is likely to**
21 **prevail on the merits in the appeal or writ petition**

22 59. The appeal filed by court-appointed counsel for the Protected Person is not likely
23 prevail on the merits for the following reasons:

24 60. First, underlying the entire appeal is whether the Protected Person has capacity to
25 direct her court-appointed counsel. All of the medical evidence in this case shows that Ms. Jones
lacks capacity to care for herself in nearly every facet of life, including directing legal affairs.

1 Back in 2019, Dr. Brown found that Ms. Jones’ mental capacity was in serious decline requiring
2 a guardianship to protect her from undue influence. On December 28, 2021, Dr. Brown found
3 that the Ms. Jones’ mental capacity has severely deteriorated even more over the last two years.
4 Ms. Jones lacks capacity to direct her legal affairs, manage her finances, and otherwise take care
5 of herself. She requires 24/7 care and supervision. Her mental capacity is so deteriorated that she
6 cannot weigh the costs and benefits of decisions and cannot retain information long enough to
7 make decisions. She does not know what an appeal is generally or what appeals are being filed
8 on her behalf specifically. Ms. Jones’ court-appointed counsel has never provided any medical
9 evidence to the contrary. Court-appointed counsel’s contentions that Ms. Jones is directing her
10 legal affairs are unfounded—all the medical evidence establishes she cannot handle doing so.

11 61. Second, the appellate contention is not likely to prevail on appeal that Ms. Jones’
12 due process rights have been violated because the Court is not adhering to the representations of
13 her court-appointed counsel as the law of the case. Due process is satisfied where interested
14 parties are given an “opportunity to be heard at a meaningful time and in a meaningful manner.”
15 *J.D. Constr., Inc. v. IBEX Int’l Grp., LLC*, 126 Nev. 366, 377, 240 P.3d 1033, 1041 (2010)
16 (quoting *Mathews v. Eldridge*, 424 U.S. 319, 333, 96 S.Ct. 893, 47 L.Ed.2d 18 (1976)).

17 62. The required opportunity to be heard has been amply provided. This Court has
18 not precluded Ms. Jones or court-appointed counsel from any opportunity to be heard throughout
19 this matter. It is the court-appointed counsel for the Protected Person who has made decisions
20 for Ms. Jones to not personally appear before this Court during the numerous hearings held,
21 including the Evidentiary Hearing where this Court properly heard arguments and took evidence
22 pertaining to whether the guardian was violating Ms. Jones’ rights.

23 63. Even though court-appointed counsel repeatedly insisted prior to the Evidentiary
24 Hearing, and insists subsequent to the Evidentiary Hearing, that Ms. Jones has full capacity to
25 initiate and calendar visitation schedules with her large family and also is actively directing

1 several appeals to the Nevada Supreme Court in this matter, oddly, just prior to the Evidentiary
2 Hearing, court-appointed counsel for Ms. Jones temporarily switched positions and argued
3 instead that Ms. Jones lacked capacity to testify and fought to preclude Ms. Jones from testifying
4 at the Evidentiary Hearing where Ms. Jones could have expressed her wishes directly to the
5 Court and all parties.

6 64. In a curious evolution of arguments Ms. Jones' court-appointed counsel now
7 claims due process has been violated because this Court does not unquestioningly follow court-
8 appointed counsel's decrees about what the Protected Person supposedly wants or what is best
9 for the Protected Person. However, having determined that Ms. Jones' rights were being
10 unlawfully violated by the guardian, this Court was required to and had wide discretion to protect
11 Ms. Jones from Kimberly's continued violations of her rights and the rights of Ms. Jones'
12 immediately family. The Court surely could not continue to allow Kimberly to unlawfully restrict
13 visits and communication between Ms. Jones and her family members. This Court weighed the
14 credibility of court-appointed counsel's representations of Ms. Jones' capacity and Ms. Jones'
15 wishes and found it not as compelling as the totality of medical evidence, pleadings and
16 testimony received by the Court. Court-appointed counsel chose to oppose allowing Mr. Jones
17 to express herself at the evidentiary hearing and also chose not to respond many times to requests
18 by other parties for the Court to remove Kimberly based on the record. Ms. Jones' due process
19 rights were not violated by the Court.

20 65. Third, court-appointed counsel contends that Ms. Jones' "due process" rights and
21 the Protected Persons Bill of Rights were violated when this Court found that guardianship
22 proceedings were a better means under the circumstances than a power of attorney in protecting
23 Ms. Jones and her estate. However, court-appointed counsel did not dispute that Ms. Jones was
24 being exploited prior to the appointment of guardian. Court-appointed counsel never denied that
25 Ms. Jones lost the Kraft home for less than market value, that Ms. Jones' dogs were taken from

1 her, nor has court-appointed counsel refuted any of the other serious allegations that were
2 presented before this Court in 2019. All of the instances of alleged abuse occurred while the
3 Power of Attorney in question was in operation. The Power of Attorney framework was
4 insufficient to protect Ms. Jones in the circumstances of this case. Court-appointed counsel never
5 showed this Court that the Protected Person would have been protected under the circumstances
6 had the guardianship proceedings been terminated, the legal aid attorney allowed to withdraw,
7 the Court's oversight and the guardianship compliance offices reviewed been suspended and the
8 Power of Attorney document reinstated.

9 66. Fourth, the Protected Person contends that it was a violation of the Bill of Rights
10 for this Court to investigate and contemplate a "visitation schedule." Such a contention
11 misleadingly narrows the situation before the Court. This Court found that Kimberly, as
12 guardian, was restricting and precluding visits and communication between Ms. Jones and her
13 family in direct violation of the bill of rights. Ms. Jones' court-appointed counsel never disputed
14 Robyn and Donna's allegations that Kimberly was isolating Ms. Jones and violating her rights
15 by restricting visits. Ms. Jones' court-appointed counsel has never told this Court that Ms. Jones
16 denies that Kimberly restricted her visits and communication. Ms. Jones' court-appointed
17 counsel has never argued that Robyn and Donna fabricated all the numerous specific instances
18 in which Kimberly restricted or precluded visits and communication from occurring. Ms. Jones'
19 court-appointed counsel took no position on other serious allegations such as Kimberly pre-
20 maturely relocating Ms. Jones to Anaheim before this Court authorized it. Ms. Jones' court-
21 appointed counsel has also largely remained silent on Kimberly's missing and/or statutorily
22 deficient accounting, budget, care plan, and inventories. Accordingly, Ms. Jones' court-
23 appointed counsel has never denied that Kimberly was violating Ms. Jones' rights.

24 67. Fifth, court-appointed counsel for the Protected Person contends that this Court
25 violated the Protected Person's due process rights and rights under the protected person's Bill of

1 Rights by removing Kimberly as guardian because Ms. Jones wants Kimberly to be her guardian.
2 It is important to note that Robyn and Donna have repeatedly filed documents over the course of
3 months asking the Court to consider removing Kimberly as guardian *sua sponte*. Court-
4 appointed counsel for Ms. Jones never filed a written objection or opposition to any of those
5 requests even though the request was made time and again.

6 68. Sixth, court-appointed counsel for the Protected Person contends that the
7 Protected Person's due process rights and other guardianship statutes were violated because the
8 Court did not appropriately vet Robyn before appointing her as successor guardian. But this
9 Court already had. It is the law of the case that Robyn meets the statutory requirements to be
10 appointed as guardian since the Court appointed Robyn as temporary guardian.

11 69. Seventh, Ms. Jones' court-appointed counsel provides no authority contesting this
12 Court's wide discretion to schedule evidentiary hearings or to appoint Guardians ad Litem.
13 Additionally, court-appointed counsel provides no authority showing that the Court had no right
14 to investigate allegations that Kimberly was violating Ms. Jones' bill of rights. The appeal is not
15 likely to prevail on the merits.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

Dated this 29th day of June, 2022

Juda Marguis

Respectfully submitted by:
MICHAELSON LAW

John P. Michaelson, Esq.
Nevada Bar No. 7822
john@michaelsonlaw.com
Matthew D. Whittaker, Esq.
Nevada Bar No. 13281
matthew@michaelsonlaw.com
*Guardian, Robyn Friedman,
and Donna Simmons*

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 In the Matter of the Guardianship of: CASE NO: G-19-052263-A
7 Kathleen Jones, Protected DEPT. NO. Department B
8 Person(s)
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Findings of Fact, Conclusions of Law and Judgment was served via the
13 court's electronic eFile system to all recipients registered for e-Service on the above entitled
14 case as listed below:

15 Service Date: 6/29/2022

16 Heather Ranck	heather@michaelsonlaw.com
17 Kelly Easton	kellye@sylvesterpolednak.com
18 Monica Gillins	mlg@johnsonlegal.com
19 John Michaelson	john@michaelsonlaw.com
20 Ty Kehoe	TyKehoeLaw@gmail.com
21 Jeffrey Sylvester	jeff@sylvesterpolednak.com
22 Kate McCloskey	NVGCO@nvcourts.nv.gov
23 Sonja Jones	sjones@nvcourts.nv.gov
24 LaChasity Carroll	lcarroll@nvcourts.nv.gov
25 Melissa Romano	mromano@dlnevadalaw.com
26 Elizabeth Brickfield	ebrickfield@dlnevadalaw.com
27	
28	

1	Elizabeth Mikesell	emikesell@lacsns.org
2	Scott Simmons	scott@technocoatings.com
3	Cameron Simmons	Cameronnnscoott@yahoo.com
4	Robyn Friedman	vgsfun@hotmail.com
5	Perry Friedman	friedman@cs.stanford.edu
6	Donna Simmons	donnamsimmons@hotmail.com
7	Ammon Francom	ammon@michaelsonlaw.com
8	Ammon Francom	ammon@michaelsonlaw.com
9	Kimberly Jones	flyonthewall2you@gmail.com
10	Jennifer Bocek-Dobijanski	jbocek-dobijanski@lacsns.org
11	Peter Pratt	peter@michaelsonlaw.com
12		
13		
14		

15 If indicated below, a copy of the above mentioned filings were also served by mail
16 via United States Postal Service, postage prepaid, to the parties listed below at their last
17 known addresses on 6/30/2022

17	Elizabeth Brickfield	Dawson & Lordahl PLLC
18		Attn: Elizabeth Brickfield, Esq
19		9130 West Post Road, Suite 200
20		Las Vegas, NV, 89148
21	Kimberly Jones	18543 Yorba Linda Blvd #146
22		Yorba Linda, CA, 92886
23		
24		
25		
26		
27		
28		