

**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

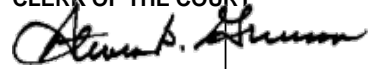
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**RESPONDENTS' APPENDIX  
Volume 20 (Nos. 3220–3393)**

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**PET**

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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

**PETITION TO REMOVE LEGAL AID CENTER OF SOUTHERN NEVADA;  
OR, IN THE ALTERNATIVE, TO LIMIT THE SCOPE OF COURT APPOINTED  
COUNSEL; PETITION TO REAPPOINT THE GUARDIAN AD LITEM; PETITION  
FOR INSTRUCTIONS CONCERNING USING FUNDS TO PAY FOR LEGAL  
SERVICES**

☐ 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 Guardian, Robyn Friedman, by and through the law firm, Michaelson Law,  
and respectfully submits to this Honorable Court this *Petition to Remove Legal Aid Center of  
Southern Nevada; Or, in the Alternative, to Limit the Scope of Court-Appointed Counsel; Petition*

1 to Reappoint the Guardian Ad Litem; Petition for Advice and Instructions Concerning Using  
2 Funds to Pay for Legal Services, as follows:

3 **BACKGROUND**

4 1. The Protected Person, Kathleen June Jones (hereinafter “Protected Person” or “June”), was  
5 born on July 20, 1937, and has now returned to Nevada where she has chosen to live for decades.  
6 June currently resides with her daughter at 1315 Enchanted River Drive, Henderson, Nevada  
7 89012, because her long-time Las Vegas home was taken from her in a series of events that gave  
8 rise to this guardianship. June’s daughter Kimberly Jones (hereinafter “Kimberly” or “Kim”) held  
9 a power of attorney for June but was unable or unwilling to protect June from repeated and various  
10 forms of exploitation.

11 2. In the fall of 2019, after June lost her home and following June being isolated from her  
12 family and care providers (including Kimberly) through the actions of several individuals, June’s  
13 daughters Robyn Friedman (hereinafter “Robyn” or “Successor Guardian”) and Donna Simmons  
14 (hereinafter “Donna”), petitioned for and were authorized by the Court to act as temporary  
15 guardians for June to secure June’s health and well-being, ensure she received proper medical  
16 care, prepare an actual plan of care which Kimberly refused to do, ensure June had access to the  
17 rest of her family and to secure her finances.

18 3. From the very beginning of the case, the Court and all parties had clear indication of June’s  
19 diminished cognitive capacity. In Kimberly’s very first pleading in this case, her Opposition To  
20 *Ex Parte* Petition for Appointment of Temporary and General Guardian of the Person and Estate;  
21 Alternatively, Counter-Petition for Appointment of Kimberly Jones as Temporary and General  
22 Guardian of the Person and Estate (“Opposition”), Kimberly argued, “Upon information and  
23 belief, in or about 2016, June was first noted in her medical records as experiencing lapses of  
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1 memory. In 2017, June was diagnosed with a degenerative neurological disorder.” *See* Opposition  
2 filed herein on October 2, 2019, Pg 6, lines 2-5.

3 4. Also – again, at the very commencement of this action - Kimberly attached and referenced  
4 a doctor’s report from the Cleveland Clinic Lou Ruvo Center for Brain Health which stated that  
5 “Ms. Jones has a degenerative neurological disorder resulting in impairment of memory,  
6 judgment, and other cognitive functions. **She is not capable of handling her own affairs,**  
7 **including medical, financial, and legal decisions, and requires a guardian.**” *See* Exhibit 1,  
8 Letter from Dr. Marwan Sabbagh, M.D. (emphasis added).

9 5. These medical records and evidence of incapacity were of course also provided at the very  
10 beginning of this case to June’s Court-appointed attorneys, the law firm of Legal Aid Center of  
11 Southern Nevada (hereinafter “LACSN” or “the legal aid law firm”).

12 6. In the very first hearing on the case, on October 3, 2019, June’s LACSN attorney Ms. Parra-  
13 Sandoval said in reference to June’s long-time Las Vegas home that was taken from her, “[s]he  
14 has no recollection at all of transferring her home to anyone. She doesn’t remember signing a  
15 deed, so I’m very concerned.” *See* Transcript re: All Pending Motions for hearing held on  
16 Thursday, October 3, 2019, filed herein on January 31, 2020, pg 9, lines 13-15. She also said that  
17 June told her, regarding the sale of the house, “that was news to her”. *Ibid.*, lines 18-19. Ms. Parra-  
18 Sandoval later expressed that “...she believes it’s her home. She doesn’t recall the transaction  
19 that happened. She still believes it’s her house. So she wants to live there and she prefers the  
20 daughters to take care of her.” *Ibid.*, pg 11, lines 9-12.

21 7. This is one of many examples of what Robyn, Donna, June’s son Scott and virtually all  
22 family members have tried to tell LACSN – in addition to the medical evidence that LACSN was  
23 in possession of – that although June can mouth words and speak a few words at a time, her  
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1 answers almost invariably lack context, memory or understanding of what is actually happening  
2 or the consequences of various actions, and this is why LACSN does not have a working attorney-  
3 client relationship with June<sup>1</sup>. The LACSN law firm fitfully acknowledges how out of touch with  
4 reality June is but then denies June's condition without any support and continues to claim June  
5 is actively directing them in very complex and very costly and unnecessary appeals and other  
6 filings that are detrimental to June's estate and her family.

7 8. At the very next hearing in this matter, on October 15, 2019, Ms. Maria Parra-Sandoval,  
8 the court-appointed attorney for June, admitted that June lacked understanding about how she lost  
9 her home or that it was even sold:

10 Ms. Parra-Sandoval: ... So, you know, she has no recollection of that transaction happening  
11 and she still believes the house is completely hers.

12 The Court: Did you explain to her that it is no longer hers?

13 Ms. Parra-Sandoval: I did.

14 The Court: Does it surprise her every time you speak to her about it?

15 Ms. Parra-Sandoval: Yes.

16 (See Transcript re: Citation to Appear for hearing held on Tuesday, October 15, 2019, filed  
17 herein on January 31, 2020, pg 11, lines 7-16).

18 9. Robyn and Donna advocated strenuously for their sister Kimberly Jones to step up and act  
19 at least as temporary guardian since June had nominated her to serve as her guardian should the  
20 need arise, and since June's power of attorney and other estate planning documents were  
21 completely ineffective to stop the financial exploitation and other abuse of June.

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22 <sup>1</sup> As other examples of June's incapacity, one can ask June what she ate for breakfast, whether she prepared it  
23 herself, or whether she has seen her son lately. Successor Guardian reports that she has answered each of these  
24 questions incorrectly and frequently does so throughout the course of this guardianship. For example, stating she  
25 had one thing for breakfast and prepared it herself, when in fact she ate something completely different prepared by  
a caregiver. As has been frequently made mention in these proceedings she is prone to say she has seen her son  
recently when she may have not actually seen him in over two years. June's one or two-word answers that can seem  
like she is conversing often turn out to be untrue perceptions on her part. This is what Dr. Brown and other medical  
professionals have reported. But LACSN is often in denial of this reality. This is why Successor Guardian and her  
sister have repeatedly requested June to be canvassed by the Court on the record, to show her lack of context and  
capacity. However, LACSN has opposed June speaking for herself.

1       10. Kimberly initially cooperated with her sisters but, in the face of mounting questions about  
2 her own conduct and handling of June's finances, instead of cooperating and providing  
3 transparency, later steadfastly refused to serve as guardian to bring transparency to the situation  
4 or to protect June or her property. Thus, Robyn and Donna were forced to petition for relief from  
5 this Court to protect their mother. This Court granted their request for a temporary guardianship  
6 and later extended the temporary guardianship.

7       11. Robyn and Donna served as Temporary Guardians of June's estate and person under  
8 extremely difficult and urgent circumstances, with issues of elder abuse including exploitation,  
9 isolation, and "granny snatching" to be resolved. Robyn and Donna's efforts to establish the  
10 temporary guardianship and transform this case into a general guardianship were essential for the  
11 protection of June and her estate. When the award of fees for the temporary guardianship was  
12 appealed by the LACSN law firm, the Court of Appeals upheld the District Court's findings  
13 recognizing the need for the expenditures and the significant efforts made by Robyn and Donna  
14 to protect their mother under the circumstances. June's estate will now likely be diminished by  
15 having to bear at least some of the cost of that needless appeal.  
16

17       12. Robyn and Donna continued to urge Kimberly to accept a role as June's guardian and to  
18 be transparent with the Court to protect June and because there were so many questions about  
19 Kimberly's own conduct. Although June's house had been taken, June's medical appointments  
20 had been inappropriately cancelled, Kimberly herself had been prevented by other parties many  
21 times from seeing her own mother – even though all parties acknowledged Kimberly was June's  
22 designated agent in a power of attorney document – and while contention and anger and questions  
23 about June's finances were reaching a boiling point, Kimberly doggedly refused to seek the  
24 protection and transparency of the guardianship Court. Kimberly relented at the last minute in a  
25

1 hearing when upon information and belief Robyn and Donna were about to be appointed by the  
2 Court as June's general guardians.

3 13. Thereafter, Kimberly filled the role of guardian for about two years but refused to adhere  
4 to most of the requirements of a guardian under Nevada law.

5 14. This matter remained contentious when Kimberly almost immediately began weaponizing  
6 her position as guardian to punish family members who questioned her by, among other things,  
7 interfering with communication and visitation with June and isolating June. June's Court-  
8 appointed counsel failed to act to protect June from Kimberly's isolation and exploitation. June's  
9 Court-appointed counsel stated she could do nothing regarding the isolation and requested at a  
10 hearing and in phone calls in September of 2020 that Donna and Robyn take up their complaints  
11 with the Court by filing a petition regarding those matters. *See* video of hearing from September  
12 17, 2020, at 12:21 pm. Seeing that Kimberly was refusing to cooperate as guardian, the Court also  
13 requested that Donna and Robyn file a petition for communication and visitation. *See ibid.*, at  
14 12:30 pm. Donna and Robyn filed their petition regarding communication and visitation on  
15 December 20, 2020, which provided excruciating detail of many instances of Kimberly isolating  
16 and exploiting June, contrary to her oath as guardian. The petition and evidence presented  
17 ultimately culminated in an evidentiary hearing held on June 8, 2021.

18 15. The Court also had to apply an inappropriate amount of resources admonishing and/or  
19 cajoling Kimberly to properly account for her actions and inactions. Most, or all, of those issues  
20 remain unsolved, including the need for information pertaining to many accounts that were setup  
21 by Kimberly in Kimberly's own name as opposed to being setup as guardianship accounts.  
22 Kimberly refused to provide information only she can provide since the accounts and other matters  
23 are in her name. Further, despite Kimberly boasting a master's degree in geriatric care, and  
24  
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1 supposedly years of experience in hundreds of similar court cases as a court-appointed advocate  
2 in California, her accountings regarding what she has been doing during the pendency of the  
3 guardianship (not to mention what she did with June's money and property prior to the  
4 guardianship) were so half-hearted, passive-aggressive and deficient that Donna and Robyn were  
5 forced to expend large amounts of time and money to object as interested parties when LACSN  
6 did nothing to protect June or her estate. The Court was also so concerned that it has, at multiple  
7 times during Kim's tenure as guardian, directed Nevada's statewide Guardianship Compliance  
8 Office to review the filings and prepare a report on the deficiencies.

9 16. After being admonished and warned almost continually for two years, Kimberly was finally  
10 removed from her position as guardian on December 6, 2021, after willfully failing to adhere to  
11 many of the requirements of a guardian under Nevada law, despite being represented the entire  
12 time by multiple very capable law firms.

13 17. Despite the LACSN law firm failing to object to a single aspect of Kimberly's conduct and  
14 despite LACSN actually supporting Kimberly throughout these proceedings, the Court removed  
15 Kimberly as a result of many willful inappropriate actions and inactions detailed in the Court's  
16 45-page order entitled Findings of Fact and Conclusions of Law and Order Regarding Visitation,  
17 First Annual Accounting, Guardian's Fees, Caretaking Fees, Attorney's Fees and Costs, and  
18 Removal of the Guardian, that was issued on December 6, 2021.

19 20 18. The Court reinforced this ruling with its June 29, 2022, Findings of Fact, Conclusions of  
21 Law, and Order Denying Motion to Stay Order for Removal of Guardian and Order Appointing  
22 Successor General Guardian of the Person and Estate and For Issuance of Letters of General  
23 Guardianship ("June 29<sup>th</sup> Order"), which set forth additional detailed findings of fact and  
24 conclusions of law regarding Kimberly's misconduct and June's diminished cognitive capacity.  
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1 To be clear, this additional order and the legal fees incurred by various parties was occasioned  
2 because LACSN filed a motion to stay to reinstate Kimberly despite all the evidence and findings  
3 about Kimberly's misconduct, isolation of June and failure to account.

4 19. The June 29<sup>th</sup> Order finds that "this Court fully vetted Robyn as guardian. Robyn's petition  
5 for temporary and general guardianship included all factors required by statute about her  
6 qualifications to act as guardian and this Court found that she was qualified". *See Findings of*  
7 *Fact, Conclusions of Law, and Order Denying Motion to Stay for Removal of Guardian and Order*  
8 *Appointing Successor General Guardian of the Person and Estate and For Issuance of Letters of*  
9 *General Guardianship* filed herein on June 29, 2022, pg 3, lines 12-15.

10 20. The June 29<sup>th</sup> Order further found that "Kimberly has acknowledged several times, and in  
11 multiple pleadings, Ms. Jones' profound lack of capacity and inability to make choices on her  
12 own." *See ibid.*, pg 4, lines 12-14 It also highlighted that "Ms. Jones' court-appointed legal aid  
13 attorney filed an Opposition to the Visit Petition that did not acknowledge the myriad of  
14 allegations that Kimberly was restricting visits and communication in violation of Ms. Jones'  
15 rights." *See ibid.*, pg 7, lines 9-11 The June 29<sup>th</sup> Order further found that "Court-appointed counsel  
16 did not address the many specific allegations of abuse and isolation by Kimberly." *See ibid.*, pg 7,  
17 lines 22-23.

18 21. In its Conclusions of Law for the June 29<sup>th</sup> Order, the Court concluded, "The object of the  
19 appeal has little to do with the Protected Person and everything to do with a misguided attempt to  
20 change the guardianship statutes by establishing a pattern or expectation that once a legal aid  
21 attorney makes a representation of a protected person's wishes, all further inquiry, even by the  
22 Court, must cease." *See ibid.*, pg 18, lines 6-10 The Court also concluded, "All of the medical  
23 evidence in this case shows that Ms. Jones lacks capacity to care for herself in nearly every facet  
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1 of life, including directing legal affairs.” *See ibid.*, pg 19, lines 24-25. Additionally, the Court  
2 concluded:

3 **Ms. Jones lacks capacity to direct her legal affairs, manage her finances, and otherwise**  
4 **take care of herself.** She requires 24/7 care and supervision. Her mental capacity is so  
5 deteriorated that she cannot weigh the costs and benefits of decisions and cannot retain  
6 information long enough to make decisions. She does not know what an appeal is generally  
7 or what appeals are being filed on her behalf specifically. Ms. Jones’ court-appointed counsel  
8 has never provided any medical evidence to the contrary. **Court-appointed counsel’s**  
9 **contentions that Ms. Jones is directing her legal affairs are unfounded**—all the medical  
10 evidence establishes she cannot handle doing so. *See ibid.*, pg 20, lines 4-10 (*emphasis added*).

### 11 PURPOSES OF THIS PETITION

12 22. Successor Guardian is concerned about the ongoing expense of the litigation and the  
13 anticipated expenses given the behavior of other parties, as well as the expense of responding to  
14 the appeals filed by the Protected Person’s Court-appointed attorney, the LACSN law firm,  
15 allegedly at the Protected Person’s direction. Successor Guardian wants to minimize future  
16 litigation and disruption to the guardianship.

17 23. As the Court is likely aware from representations in various hearings and pleadings,  
18 Successor Guardian has had to expend large sums seeking to protect her mother. While every  
19 effort has been made to reduce or avoid an impact on June’s estate, Kimberly’s refusal to comply  
20 with guardianship rules and statutes, as well as her isolation of June, and LACSN’s overly  
21 aggressive and imprudent appeals have made this impossible. The Guardian is now forced to seek  
22 reimbursement from the guardianship estate for these expenditures and will need to seek additional  
23 reimbursement for planned future expenditures for the protection of June. Before pursuing  
24 additional protections for June, however, Successor Guardian seeks changes to June’s  
25 representation and desires instructions from this Honorable Court as to the Court’s inclinations

1 with respect to these proposed actions and reimbursing/awarding fees to the Successor Guardian  
2 from the estate and/or other parties for having to make these efforts.

3 24. Successor Guardian petitions this court for the following:

- 4 a. to replace LACSN and appoint a private attorney to represent June, to be paid for  
5 by June's estate as allowed under NRS 159.0485(2)(b);  
6 b. or in the alternative, to have this Honorable Court revise its initial order appointing  
7 the LACSN law firm to limit the scope of LACSN's representation of June pursuant  
8 to Nevada's Statewide Rules of Guardianship 9(I) based upon the evidence and  
9 findings that June lacks capacity to have "a normal attorney-client relationship";  
10 c. to reappoint Elizabeth Brickfield, Esq. as a Guardian ad Litem, to serve indefinitely,  
11 as allowed under NRS 159.0455 to provide the Court with information and advice  
12 to protect and advance June's best interests. Guardian ad Litem is to be paid from  
13 assets of the estate, subject to Court confirmation.  
14

15 25. Successor Guardian also requests instructions and direction concerning various issues  
16 including:

- 17 a. the evidentiary hearing on the Order to Show Cause;  
18 b. the evidentiary hearing on the Petition to Restrict;  
19 c. a petition to create a trust;  
20 d. response and corrections to the Compliance Office's report, including hiring a CPA  
21 to investigate claims made or items missed in the report;  
22 e. continued communications with Teri or her representatives such as her husband to  
23 coordinate visitation and communication with June when Teri adamantly refuses to  
24 communicate with Successor Guardian and has threatened legal action against  
25

1 Successor Guardian if Successor Guardian tries to communicate with Teri directly  
2 or even indirectly through other family members or friends;

- 3 f. Successor Guardian's belief that it is imperative and of utmost importance for  
4 Kimberly and Teri to see their mother despite differences, and to identify how to  
5 accomplish that going forward;  
6 g. Petition for recovery of assets from Kimberly, the former guardian; and  
7 h. Petition for reimbursement of expenses and attorney's fees.

8 **LAW AND APPLICATION**

9 **PETITION TO REPLACE LACSN**

10 26. Successor Guardian respectfully requests this Court replace LACSN with private counsel.

11 27. NRS 159.0485 directs the Court to appoint counsel for the protected person. The statute  
12 references appointing a legal aid attorney for indigent persons, and even includes instructions for  
13 petition for a private attorney when the protected person has the means to pay for representation.  
14

15 28. Here, June has a healthy, though not inexhaustible, estate. She is more than capable of  
16 paying for her own attorney.

17 29. LACSN's representation of June has harmed her by being silent and complicit in the face  
18 of exhaustively collected examples of June being isolated and financially exploited. Even now,  
19 LACSN has an appeal lodged to reinstate Kimberly despite all the evidence of her isolation of  
20 June, unwillingness to account and other misconduct.

21 30. LACSN's representation of June has exponentially prolonged and skyrocketed the expense  
22 and acrimony of this matter and has not benefitted June.

23 31. June would have been, and going forward, could be, better represented by almost any other  
24 individual attorney or legal organization other than LACSN that is so entrenched in its war to  
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1 vindicate its actions in this case. June's estate will be enormously better preserved, and June will  
2 be better protected by having other counsel.

3 32. Successor Guardian does not believe this Court needs cause to replace court-appointed  
4 counsel for a protected person. However, even if such a requirement did exist, there is cause to  
5 remove LACSN.

6 33. LACSN has acted inappropriately in this matter, including, among other things, failing to  
7 protect June despite numerous opportunities and in the face of a large body of detailed evidence  
8 of harm being done to June and her finances, and also for filing not less than four unnecessary and  
9 imprudent appeals to the Nevada Supreme Court, including one appeal to the Supreme Court over  
10 a \$5700 award of fees to the Guardian ad Litem.

11 34. LACSN has filed its appeals even though the Protected Person has no capacity to direct, or  
12 even understand the scope, consequences or impact of these horrible tactics by LACSN upon  
13 herself, her family and her estate.

14 35. LACSN hurt June by undermining her civil lawsuit to recover her Las Vegas home that  
15 was taken from her during her incapacity. Despite the on-going litigation by June (authorized by  
16 the guardianship Court) to show she was exploited and did not understand what she was doing  
17 when she signed away her very valuable home for far less than market value, LACSN allowed (or  
18 failed to ever object) to June signing declarations and other documentation such as mortgage  
19 refinance papers all while June was asserting she could not consent to the transfer of her home  
20 because she was incapacitated. These actions were of specific note to the judge in that civil matter,  
21 and upon information and belief were part of the downfall of June's claims and the ensuing  
22 settlement of those claims that was so disastrous for June.  
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1 36. Concurrently with those proceedings in district court, in contemporaneous guardianship  
2 hearings, and over the objection of family members and others, LACSN counsel insisted on over  
3 and over again stating that June was actively directing her in legal matters and fully understood  
4 such things as appeals, etc. This contradicted other statements by LACSN counsel that June did  
5 not comprehend her situation and directly undermined June's claims in civil court that she had  
6 advanced dementia and could not have understood the harm of signing her house away for little or  
7 no consideration.

8 37. LACSN also continuously sought to undermine efforts by June's family to visit June by  
9 stating there were no real visitation or communication problems and everything would be resolved  
10 if family would "just call June" even though evidence showed June could not reliably answer a  
11 phone and lacked capacity to handle a schedule or calendar.

12 38. Later, LACSN reversed itself in opposing any attempt to coordinate visits by filing a  
13 petition to impose an unrealistic and isolating visitation schedule that all of June's family testified  
14 at the evidentiary could not have come from June.

15 39. In addition to every other witness saying that the LACSN petition for an extremely limited  
16 visitation regimen could not have come from June, at that evidentiary hearing dated June 8, 2021,  
17 even Kimberly testified it was not something her mother would have crafted. Kimberly was asked  
18 if the visitation schedule was proposed by her. She stated, "Absolutely not, no." She further  
19 stated, "And my entire family now thinks that Maria's [the LACSN attorney's] proposed visitation  
20 schedule that she discussed with my mother is my proposed visitation schedule." *See* Transcript  
21 Re: Evidentiary Hearing held Tuesday, June 08, 2021 filed herein on March 25, 2022, pgs 323-  
22 325.  
23  
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1 40. Kimberly further stated in her filing entitled Kimberly Jones' Response to Findings of Facts  
2 and Conclusions of Law and Order Regarding Visitation, First Annual Accounting, Guardian's  
3 Fees, Caretaking Fees, Attorney Fees and Costs and Removal of the Guardian On page 3, lines 8-  
4 14 that:

5 I do believe that my mom wants to communicate and visit with all of her family members  
6 and always has. My mom nor myself never intended to restrict visitation in  
7 communication to a two-hour period on Fridays Which is clearly how The petition  
entered by my mom's legal aid attorney was interpreted.

8 41. These are just a few examples of LACSN law firm personnel leading June in conversations  
9 with her and bootstrapping her one- or two-word answers from likely very brief interactions into  
10 a narrative that suited LACSN's purposes.

11 42. Furthermore, LACSN continuously and knowingly has misclassified Robyn's requests to  
12 see/talk to/visit with her mother as a demand for a forced visitation schedule. Robyn repeatedly  
13 requested opportunities in which June would be available for connections with her daughters.  
14 Robyn and Donna often clarified in response to Kimberly's misrepresentations, often repeated and  
15 supported by LACSN, that no one was trying to force or compel June to visit with her family. For  
16 example, in the Verified Petition for Communication, Visits, and Vacation Time with Protected  
17 Person filed on December 30, 2020, Robyn and Donna stated:

18 "Petitioners do not desire to compel Ms. Jones to visit with them. Rather, they seek a  
19 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  
21 with Petitioners, Petitioners would of course respect that, but a framework needs to be in  
place, rather than a directive from Kim to "just call mom." (Page 3, point 8).

22 43. As another example, in the Petitioner's Omnibus Reply to: (1) Kimberly Jones' Opposition  
23 to Verified Petition for Communication, Visits, and Vacation Time with Protected Person; and (2)  
24 Kathleen June Jones' Opposition to Verified Petition for Communication, Visits, and Vacation  
25 Time with Protected Person, Robyn and Donna stated:

1 “Regardless of what the Oppositions say, the Petition is not about treating Ms. Jones like  
2 a child. The Petition is not about forcing Ms. Jones to do things that she does not want to  
3 do. The Petition is not about disregarding Ms. Jones’ wishes. The Petition is about how to  
4 handle the “simple logistics” of helping Ms. Jones when she expresses her desire to her  
5 daughters that she wants to see them.” (Page 4, point 6)

6 44. Even the Court has explained in various hearings that it believes Robyn and Donna and  
7 other family members are seeking simply to setup series of opportunities or windows of time that  
8 are convenient and workable for June and her caregivers when people can know ahead of time that  
9 Kimberly would try to assist June with communicating or visiting with her family, but that June  
10 could always refuse.

11 45. Incredibly, and in bad faith, the LACSN law firm keeps claiming in its pleadings, oral  
12 arguments and even in recent appeals that Robyn and Donna are trying to compel June to visit with  
13 her family. No matter how many times LACSN repeats this tired and cruel argument, it is not true,  
14 and the pleadings and hearing transcripts prove that.

15 46. Likewise, LACSN’s oft-repeated claim that Robyn and or Donna are treating their mother  
16 like a child is similarly untrue. **They are treating her like an incapacitated adult.** That is  
17 consistent with the evidence, the doctors’ reports, this Court’s findings, and the family’s  
18 experience.

19 47. LACSN should further be removed because it has fought vehemently to prevent June from  
20 speaking with or being canvassed by this Court. LACSN even filed a Writ to prevent June from  
21 testifying at the evidentiary hearing.

22 48. This violates not only Nevada’s Protected Person’s Bill of Rights guaranteeing every  
23 protected person the right to speak in a proceeding directly affecting them, but it also contradicts  
24 LACSN’s own policy that protected persons should testify. LACSN’s policy reads as follows:

25 When the attorney has no doctor’s reports, favorable testimony, or any other evidence to  
support the client’s position, **one of the best things to do is bring the client to the hearing**



1 **so that the client can speak to the judge.** Some clients want this opportunity to make their  
2 case, believing that if the judge hears them, the judge would rule in their favor.

3 *See* LACSN Guardianship Advocacy Program, “Representing The Elderly And Adults With  
4 Disabilities Who Are Facing Or Under Guardianship”<sup>2</sup>, pg 2-3. (Revised July 2018) (emphasis  
5 added)

6 49. The LACSN law firm also failed to find even one single thing objectionable in any of  
7 Kimberly’s faulty accounting(s).

8 50. LACSN failed to file any objection, concern or comment at all, or even a joinder in any  
9 opposition, to Kimberly’s petition for \$90,000 in guardian’s fees and \$101,558.24 attorney’s fees,  
10 despite Kimberly’s isolation, lack of adherence to required filings and repeated warnings from  
11 Robyn and expressions of concern from the Court about Kimberly’s faulty accounting.

12 51. LACSN’s failure to file any objection at all to Kimberly’s request for fees was particularly  
13 astonishing in light of LACSN’s filing of a robust and lengthy objection, extensive oral argument  
14 and subsequent appeal to the Nevada Supreme Court of the District Court’s order granting Robyn’s  
15 and Donna’s fee request for the time they served as Temporary Guardians. Virtually every single  
16 entry in Robyn and Donna’s counsel’s request for fees was attacked.

17 52. LACSN also failed Ms. Jones by filing unnecessary and frivolous appeals, including the  
18 Writ to prevent June from testifying before this Court which is especially concerning given the  
19 LACSN law firm’s own policy cited above.

20 53. Likewise, LACSN appears to have violated NRPC 3.1. This rule states:

21 **Rule 3.1. Meritorious Claims and Contentions.** A lawyer shall not bring or defend a  
22 proceeding, or assert or controvert an issue therein, unless there is a basis in law and fact for  
23 doing so that is not frivolous, which includes a good faith argument for an extension,  
24 modification or reversal of existing law. A lawyer for the defendant in a criminal proceeding,  
25 or the respondent in a proceeding that could result in incarceration, may nevertheless so defend  
the proceeding as to require that every element of the case be established.

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<sup>2</sup> <https://www.lacsnpobono.org/wp-content/uploads/2018/11/Attorney-Training-Manual.pdf>

1 54. LACSN violated this rule by repeatedly falsely and without support asserting that June has  
2 capacity to guide and direct litigation and understand the possible ramifications and consequences  
3 of any matter filed in her name by LACSN. LACSN has also violated this rule by 1) attempting  
4 to block June from testifying for herself and attempting to block the Court from otherwise  
5 assessing for itself June's capacity by filing a writ of prohibition and writ of mandamus; and 2)  
6 filing yet another costly appeal to the Supreme Court over a \$5700 award of fees to the Guardian  
7 ad Litem who is also a very experienced and respected attorney practicing in the area of  
8 guardianship in Clark County, Nevada.

9 55. LACSN's actions and inactions, as well as encouragement of Kimberly, choreographed  
10 perfectly to aid and abet Kimberly's exploitation and isolation of June and resulted in extremely  
11 expensive, unnecessary and protracted litigation in this matter. LACSN has not benefitted June.  
12 Benefit to the protected person is a concept ubiquitously cited by LACSN in its oppositions to  
13 private counsel and guardian ad litem fee reimbursement requests in many, many cases in Clark  
14 County, Nevada.  
15

16 56. The LACSN law firm has not benefitted June but has hurt her gravely and should be  
17 removed as counsel for failing to even attempt to protect June from the former guardian's  
18 misconduct and its continuing denial of June's true cognitive condition, causing so much harm to  
19 June, including undermining her claims for the recovery of her Las Vegas home and the cost of  
20 four unnecessary and inappropriate appeals. The LACSN law firm has seen the medical evidence  
21 and testimony in this case and knows its client cannot hold ideas and concepts in their proper frame  
22 and is not able to grasp the terrible harm this litigation including these numerous appeals are  
23 causing for her family and the expense LACSN's conduct will eventually bring upon her estate as  
24 the costs are eventually documented and petitions are filed against the estate for reimbursement.  
25

1 57. In addition to Kimberly's representations in her pleadings and in her testimony about  
2 June's severe cognitive disabilities as well as the findings of the Cleveland Clinic Lou Ruvo Center  
3 for Brain Health, the reports filed herein from Dr. Brown clearly show that June lacks capacity to  
4 direct and guide any litigation, including understanding the ramifications of legal pleadings and  
5 procedures and the cost to her estate of things such as appeals. The June 29<sup>th</sup> Order made a Finding  
6 of Fact based upon Dr. Brown's reports. Because LACSN denies June's incapacity despite the  
7 medical evidence in this case and refuses to allow the Court to hear from June herself, Successor  
8 Guardian requests that LACSN be removed for June's safety and the protection of her estate and  
9 replaced by other counsel.

10 **58. Alternate Petition to Revise this Court's Order Appointing LACSN and Limit the**  
11 **Scope of LACSN's Representations.** Should the Court allow LACSN to continue as court-  
12 appointed attorneys for June, which Successor Guardian and her family strongly oppose, Successor  
13 Guardian requests the Court revise its order appointing LACSN by limiting its representation of  
14 June to only protecting her due process rights as set forth in Statewide Rules for Guardianship 9(I)  
15 because June lacks cognitive capacity to have a "normal attorney-client relationship" as manifest  
16 by all the evidence LACSN has had from very early in this case.

17  
18 59. Successor Guardian notes that based on the evidence this Court has already found that June  
19 lacks capacity to direct her legal affairs or have a normal attorney-client relationship. Under these  
20 circumstances the Statewide Rules for Guardianship 9(I) expressly provides for a corresponding  
21 adjustment to the role of court-appointed counsel where the protected person lacks the capacity to  
22 have a "normal attorney-client relationship".

23 60. Here, all of the evidence shows June lacks the cognitive capacity to direct litigation and  
24 understand the consequences of choices, due to her diminished capacity, and all the evidence has  
25

1 pointed to this conclusion since the beginning of this case. Even Kimberly, in her initial pleading  
2 in this case, as referenced above, presented evidence including a doctor's report from the Cleveland  
3 Clinic Lou Ruvo Center for Brain Health setting forth that June lacked capacity to direct her own  
4 legal affairs.

5 61. Additionally, Dr. Brown's report of December 28, 2021, filed in this matter on January 4,  
6 2022, which is a confidential court document, and which is a follow up to findings made by Dr.  
7 Brown much earlier in this case with coordination from Kimberly, states:

8 Her long term memory demonstrated marked deterioration over the past two years. Her  
9 ability to correctly identify current responsibilities [bill paying], medications, medical  
10 conditions, financial resources, etc. is greatly diminished and largely not accurate.  
11 Although she may assent to various activities, her current functioning would suggest  
the inability to reasonably weigh the costs and benefits of many decisions." See  
Confidential Medical Documents filed herein on January 4, 2022, pg 5, section 5.

12 62. A Forensic Psychiatric Report by Dr. Brown dated December 31, 2021 was also submitted  
13 with the Physician's Certificate with Needs Assessment. This Report includes a Record Review  
14 wherein Dr. Brown noted he had previously evaluated June in September 2019. He noted medical  
15 records that June was tested with a Mini-Cog instrument which gave a score "indicative of  
16 dementing condition" and that June was diagnosed with "Alzheimer's dementia" in 2016. There  
17 was also a letter in 2019 that a physician wrote that stated June had a "degenerative neurological  
18 condition which led her to be unable to manage her own affairs including medical, financial, and  
19 legal." *Ibid.*, pg 2.

20 63. During the capacity evaluation conducted by Dr. Brown, he reported that June "stated she  
21 had never heard of Legal Aid of Southern Nevada and stated, 'I have no attorney.'" He also noted  
22 that she "stated she has no idea what appeals are in general or in specific relating to her case. She  
23 stated she has no idea how money within her estate might be affected by the filing of appeals."  
24 *Ibid.*, pg 3.  
25

1 64. Dr. Brown's professional opinion is that "Ms. Jones lacks testamentary capacity,  
2 contractual capacity, and the ability to manage her estate independently." *Ibid.*, pg 4-5.

3 65. As cited above, in the June 29<sup>th</sup> Order, this report of Dr. Brown was made a Finding of Fact  
4 and it also included a Conclusion of Law that Ms. Jones lacked the cognitive capacity to direct  
5 legal affairs.

6 66. The foregoing shows June does not have capacity to understand the risks, stress, financial  
7 ramifications, effort, time or potential unintended negative consequences of filing four  
8 unnecessary and inappropriate appeals in this case. Contrary to all the medical opinions on record  
9 in this case, the LACSN law firm has continued to claim that June has the capacity to direct this  
10 litigation and understand the consequences and risks of various actions and has done so without  
11 basis. In the June 29<sup>th</sup> Order, the Court found that "the court-appointed counsel's contentions that  
12 Ms. Jones can and has been fully understanding and directing the various appeals in this matter  
13 and that she can also fully appreciate who her family members are and facilitate complex  
14 calendaring and visitation on her own without assistance from the guardian, undermines Ms. Jones'  
15 position in the related civil court litigation that her paid for property was unlawfully taken from  
16 her because she lacked the capacity to understand and get help to stop the transfer of the property  
17 for far less than market value." *See* June 29<sup>th</sup> Order, pg 10, lines 5-11.

18 67. June's court-appointed attorney admitted from the initial hearings on this matter that June  
19 did not understand that she no longer owned her Las Vegas house, even after being told that on  
20 multiple occasions. June just could not understand or remember events.

21 68. This is clearly a case where LACSN should have sought the appointment of a guardian ad  
22 litem in accordance with Statewide Rules for Guardianship 9(I) and NRPC 1.14. Nevada  
23 Statewide Rules for Guardianship 9(I) directs:  
24  
25

1 If the protected person or proposed protected person is unable to express or  
2 communicate his or her wishes to the attorney or maintain, as far as reasonably possible, a  
3 normal client-attorney relationship, the attorney shall protect the legal interests and due  
4 process rights of the protected person or proposed protected person, and the attorney may  
5 take reasonably necessary protective action pursuant to Rule 1.14 of the Nevada Rules of  
6 Professional Conduct, which may include requesting the appointment of a guardian ad  
7 litem under NRS 159.0455 to advocate for the best interest of the protected person or  
8 proposed protected person.

9 69. Here, June lacked the capacity to maintain a reasonable client-attorney relationship from  
10 the beginning of the case. LACSN should have taken “reasonably necessary protective action”  
11 but failed to do so.

12 70. Additionally, NRPC 1.14 requires:

13 Clients With Diminished Capacity

14 (a) client’s capacity to make adequately considered decisions in connection with a  
15 representation is diminished, whether because of minority, mental impairment or for some  
16 other reason, the lawyer shall, as far as reasonably possible, maintain a normal client-lawyer  
17 relationship with the client.

18 (b) When the lawyer reasonably believes that the client has diminished capacity, is at risk  
19 of substantial physical, financial or other harm unless action is taken and cannot adequately  
20 act in the client’s own interest, the lawyer may take reasonably necessary protective action,  
21 including consulting with individuals or entities that have the ability to take action to protect  
22 the client and, in appropriate cases, seeking the appointment of a guardian ad litem, conservator  
23 or guardian.

24 (c) Information relating to the representation of a client with diminished capacity is  
25 protected by Rule 1.6. When taking protective action pursuant to paragraph (b), the lawyer is  
impliedly authorized under Rule 1.6(a) to reveal information about the client, but only to the  
extent reasonably necessary to protect the client’s interests.

71. LACSN has repeatedly violated NRPC 1.14 and has failed to safeguard June from  
Kimberly’s exploitation of June for its own interests. LACSN has repeatedly filed appeals,  
alleging that June is directing these complicated appeals when all family members who actually  
talk with June – and all the medical evidence – agree that she lacks the capacity to do so.

72. This Court has already concluded that Ms. Jones lacks capacity to direct legal affairs as  
cited above.

1 73. In the June 29<sup>th</sup> Order, this Court made a finding that “Dr. Brown found that Ms. Jones  
2 suffered from ‘profound deficits in long-term memory and general recall of overall life data, with  
3 a general paucity of detail.’” *See* June 29<sup>th</sup> Order, page 4, paragraph 15. The Court also made a  
4 finding that “Kimberly also provided medical evidence that Ms. Jones lacked capacity to care for  
5 herself and manage her medical, financial, and legal decisions. In addition, Kimberly has  
6 acknowledged several times, and in multiple pleadings, Ms. Jones’ profound lack of capacity and  
7 inability to make choices on her own” *Ibid.*, page 4, paragraph 17.

8 74. It is uncontroverted that June lacks capacity to have a normal attorney-client relationship.  
9 LACSN has failed to provide any evidence to the contrary. This conclusion is supported even by  
10 Kimberly’s statements and pleadings on file.

11 75. Petitioner requests that if this Honorable Court determines to allow LACSN to remain as  
12 June’s attorneys, that the Court revise its order authorizing LACSN to direct that they are from  
13 this point forward acting pursuant to Statewide Rules for Guardianship 9(I) only to protect June’s  
14 due process rights and that they be prohibited from denying June’s undermined capacity supported  
15 by all the evidence and testimony in this case, and that a Guardian ad Litem be reappointed to  
16 ensure June’s best interests are promoted and protected.

17 76. Successor Guardian respectfully requests that if LACSN is removed or its scope of  
18 representation redefined, that the Court provide instructions as to its inclinations toward a petition  
19 Successor Guardian would like to bring to hold LACSN responsible for its role in the protracted  
20 litigation in this matter by awarding attorney’s fees either to June’s estate or to reimburse  
21 Successor Guardian.

22 77. **Supervised Visitation.** Relatedly, and after discussion with many family members,  
23 Successor Guardian requests that if the Court determines to allow LACSN to remain as court-  
24  
25

1 appointed counsel for June, that LACSN's visits with June be supervised in some way going  
2 forward because of LACSN's continual denial of the evidence and facts surrounding June's  
3 limitations on comprehension. Perhaps a Guardian ad Litem could be allowed to be present during  
4 all meetings with LACSN personnel not to report legal strategies but to give the Court neutral  
5 perspective on June's comprehension and LACSN's claims that they are being led by June with  
6 truly informed consent and appreciation for context and consequences. Successor Guardian seeks  
7 instructions and an order on this point.

8       **78. Attempted Meet and Confer.** On July 9, 2022, counsel for the Successor Guardian sent  
9 a letter to LACSN regarding LACSN petitioning to remove itself from this matter and to petition  
10 for an appointment of a guardian ad litem to represents June's best interests going forward, as June  
11 lacks capacity to direct litigation and understand the consequences thereof. See letter to Elizabeth  
12 Mikesell, Esq., attached hereto as Exhibit 2. Debra Bookout responded on July 25, 2022, which  
13 response is attached hereto as Exhibit 3. Ms. Bookout responded that, "I have received your letter  
14 dated July 9, 2022 wherein your client demands that Legal Aid Center of Southern Nevada, Inc.  
15 withdraw from representing Ms. June Jones. Legal Aid Center will not be withdrawing from  
16 representation of Ms. Jones."

17  
18                   **PETITION TO REAPPOINT GUARDIAN AD LITEM**

19       79. All the medical and other evidence demonstrates that June lacks capacity to have a "normal  
20 attorney-client relationship". Statewide Rules for Guardianship 9(I).

21       80. In conjunction with her plea to remove or replace or limit LACSN's representation of June,  
22 Successor Guardian respectfully requests the reappointment of Elizabeth Brickfield, Esq. as  
23 Guardian ad Litem, to be paid for from June's estate.  
24  
25



1 81. The Court has authority under NRS 159 to appoint a Guardian ad Litem at any time the  
2 Court believes it will be of benefit and to provide any information required by the Court.

3 **NRS 159.0455 Appointment and duties of guardians ad litem.**

4 1. On or after the date of the filing of a petition to appoint a guardian:

5 (a) **The court may, in any proceeding, appoint a person to represent the protected**  
6 **person or proposed protected person as a guardian ad litem if the court believes that**  
7 **the protected person or proposed protected person will benefit from the appointment**  
8 **and the services of the guardian ad litem will be beneficial in determining the best**  
9 **interests of the protected person or proposed protected person; and**

10 (b) The guardian ad litem must represent the protected person or proposed protected  
11 person as a guardian ad litem until relieved of that duty by court order.

12 2. Upon the appointment of the guardian ad litem, the court shall set forth in the order  
13 of appointment the duties of the guardian ad litem.

14 3. If a court-approved volunteer advocate program for guardians ad litem has been  
15 established in a judicial district, a court may appoint a person who is not an attorney to  
16 represent a protected person or proposed protected person as a guardian ad litem. If such a  
17 program has been established, all volunteers participating in the program must complete  
18 appropriate training, as determined by relevant national or state sources or as approved by  
19 the Supreme Court or the district court in the judicial district, before being appointed to  
20 represent a protected person or proposed protected person.

21 4. A guardian ad litem appointed pursuant to this section is an officer of the court and  
22 is not a party to the case. A guardian ad litem appointed pursuant to this section shall not  
23 offer legal advice to the protected person or proposed protected person but shall:

24 (a) Advocate for the best interests of the protected person or proposed protected person  
25 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 or proposed protected person; and

(b) **Provide any information required by the court.**

(Added to NRS by 2003, 1758; A 2017, 2553) (emphasis added).

17 82. By working strenuously to prevent June from testifying, among other things, LACSN has  
18 attempted to make itself the sole arbiter of June's capacity and continues to falsely claim June can  
19 direct her legal affairs. A Guardian ad Litem provides the Court with a neutral perspective of  
20 June's capacity outside of LACSN's self-serving narrative and also allows the Court to better  
21 determine and understand June's best interest.

23 83. Ms. Brickfield is a very competent, experienced and respected attorney who has practiced  
24 for years in guardianship in Clark County, Nevada. Upon information and belief, she has also  
25 assisted LACSN in many pro bono matters and placement of such matters with other attorneys.

1 Her insights and voice in this matter could dramatically reduce litigation and expense for June  
2 where LACSN is in complete denial of all the scientific and other evidence that June can't  
3 appreciate her situation fully and can't guide or properly restrain LACSN's zeal to appeal at June's  
4 expense. Successor Guardian believes it is imperative that if LACSN is allowed to stay on as  
5 court-appointed counsel, which she vehemently opposes, that the Court has other "eyes and ears"  
6 on June that are independent of LACSN.

7 **PETITION FOR INSTRUCTIONS**

8 84. **Instructions.** Successor Guardian can seek instructions from this Court under NRS  
9 159.169, which states, in pertinent part:

10 **NRS 159.169 Advice, instructions and approval of acts of guardian.**

11 1. A guardian of the estate may petition the court for advice and instructions  
12 in any matter concerning:

13 ...

14 (f) The propriety of exercising any right exercisable by owners of property; and

15 (g) Matters of a similar nature.

16 2. Any act done by a guardian of the estate after securing court approval or  
17 instructions with reference to the matters set forth in subsection 1 is binding upon  
18 the protected person or those claiming through the protected person, and the  
19 guardian is not personally liable for performing any such act.

20 85. Given the extremely litigious nature of this litigation and difficulties faced by the interested  
21 parties as well as the Court in dealing with the many facets of the case, Successor Guardian desires  
22 to have further instructions of the Court so she might clearly know the mind of the Court regarding  
23 her pursuit of various issues for the benefit of June. Successor Guardian intends to bring petitions  
24 on various matters to this Court and would like clear understanding before doing so.

25 86. Successor Guardian fully understands that this Court will not approve the expenditure of  
legal fees and costs from the estate in advance, which is not allowed under NRS 159. However,  
given the great expense that Successor Guardian has already incurred to date in this matter and  
given the unrelenting objections and appeals of LACSN including its unwise appeal of an

1 approximately \$5700 fee award to the Guardian Ad Litem for her services, Successor Guardian  
2 desires clear instructions that she can move forward with the various needs of the guardianship  
3 with the Court's acknowledgement that she will be petitioning to receive reimbursement from the  
4 guardianship estate or other parties or actors in this action including the LACSN law firm for the  
5 legal fees and costs she has incurred and will be incurring in this matter going forward.

6 87. These issues include:

- 7 a. the evidentiary hearing on the Order to Show Cause;
- 8 b. the evidentiary hearing on the Petition to Restrict;
- 9 c. a petition to create a trust;
- 10 d. response and corrections to the Compliance Office's report, including hiring a CPA  
11 to investigate claims made or items missed in the report;
- 12 e. continued communications with Teri or her representatives such as her husband to  
13 coordinate visitation and communication with June when Teri adamantly refuses to  
14 communicate with Successor Guardian and has threatened legal action against  
15 Successor Guardian if Successor Guardian tries to communicate with Teri directly  
16 or even indirectly through other family members or friends;
- 17 f. Successor Guardian's belief that it is imperative and of utmost importance for  
18 Kimberly and Teri to see their mother despite differences, and to identify how to  
19 accomplish that going forward;
- 20 g. Petition for recovery of assets from Kimberly, the former guardian;
- 21 h. Petition for reimbursement of expenses and attorney's fees;
- 22

23 88. **Evidentiary Hearings.** The Court has authorized two evidentiary hearings in this matter,  
24 though neither has been scheduled yet by this Court. Successor Guardian knows from prior  
25

1 experience that given Kim's and LACSN's intransigence, these can entail great expense.  
2 Successor Guardian therefore would like instruction from this Court under NRS 159.169 regarding  
3 the Court's general perspective on awarding fees from the losing party and/or from the estate  
4 before moving forward with these hearings.

5 89. This is not a request for prior approval of attorney's fees and costs, but merely a request  
6 for acknowledgment from this Court that these matters are important and for the Court's  
7 inclination regarding having the estate pay for these hearings so that Successor Guardian has clear  
8 instructions that she is authorized to have counsel represent her for said hearings and for Successor  
9 Guardian to seek reimbursement from this Court with a new petition for attorney's fees under NRS  
10 159.344.

11 90. **Order to Show Cause Hearing.** Successor Guardian seeks instruction from this Court  
12 regarding the Order to Show Cause authorized in this case and the likely evidentiary hearing that  
13 will follow. At this time, the major assets of the Protected Person are the Anaheim Property and  
14 the money received in settlement of a related civil matter commonly referred to in these  
15 proceedings as the "A Case" which involved a home formerly owned by the Protected Person on  
16 Kraft Avenue in Las Vegas ("the Kraft House").

17 91. The previous Guardian, Kimberly, has been uncooperative with the transition of  
18 guardianship back to Robyn and caused substantial additional expense and fees to be incurred,  
19 resulting in this Court granting a Petition for an Order to Show Cause at the hearing on March 10,  
20 2022, as well as granting the authority to hire a California attorney to resolve Kimberly's refusal  
21 to vacate the property at the hearing on March 17, 2022.

22 92. Successor Guardian filed a Petition to Enforce, and this Court agreed to issue an Order to  
23 Show Cause and hold an evidentiary hearing as to why Kimberly should not be held in contempt.  
24  
25

1 Successor Guardian desires instruction to clarify whether the Court is expecting Successor  
2 Guardian to seek reimbursement of any fees and costs related to this evidentiary hearing from  
3 June's estate and/or other individuals or organizations if she prevails in this petition.

4 **93. Evidentiary Hearing on Petition to Restrict.** Successor Guardian filed a Petition to  
5 Restrict Visitation and this Court agreed to hold an evidentiary hearing on this topic. Successor  
6 Guardian desires instruction as to whether the Court is expecting Successor Guardian to seek  
7 reimbursement of any fees and costs related to this evidentiary hearing if she prevails.

8 **94. Petition to Create Trust.** Successor Guardian seeks instruction from the Court regarding  
9 the creation of additional estate planning documentation for June. Protected Person allegedly  
10 created a "Holographic Will" on November 23, 2012, prior to the guardianship, where she  
11 bequeathed her estate "to her children if he/she survives me or if not to the other children who  
12 survive me "per Capital" [sic]".

13 **95.** Upon information and belief, an original of this will has not been located to date and is not  
14 in the possession of the Protected Person, Kimberly, or the Successor Guardian. Successor  
15 Guardian would like instructions as to the creation of a trust that embodies the testamentary intent  
16 outlined in the holographic will, as well as authorization to expend estate funds on a petition to  
17 create a trust under 159.078.1(c), and the preparation of the trust instrument and ancillary  
18 documentation.  
19

20 **96.** NRS 159.078(1)(c) requires a guardian to seek instructions of the Court prior to creating a  
21 trust for the estate of the Protected Person, explicitly stating "Create for the benefit of the protected  
22 person or others a revocable or irrevocable trust of the property of the estate." A trust is necessary  
23 at this time to safeguard the testamentary intent of the Protected Person as expressed in the copy  
24 of her holographic will that is available to the parties, as well as to avoid probate. By the plain  
25

1 language of the statute, a guardian can create a trust for the protected person with approval of the  
2 court. Given the past litigious nature of these proceedings, a trust would also serve the interests of  
3 judicial economy by avoiding probate. This Court has substantial knowledge of this matter, and  
4 any new court would be faced with the difficulty of coming to an understanding of the parties, as  
5 well as preserving the expressed intent of the Protected Person.

6 97. Successor Guardian believes that no interested party would object to the creation of a trust  
7 for the Protected Person's estate. Such a trust would be under the jurisdiction of this Court and  
8 provide an additional safeguard of the assets of the Protected Person. NRS 159.127 explicitly  
9 allows the guardian of an estate to place a property into a trust. The Successor Guardian is therefore  
10 requesting authority to act in accordance with statute to safeguard the expressed testamentary  
11 intent of the Protected Person. NRS 159.113 sets forth the need for a Guardian to seek approval of  
12 the court before placing in trust any property of the protected person pursuant to NRS 159.127.  
13 NRS 159.169 sets forth the requirements necessary for a petition seeking guidance of the court for  
14 such activities, including creating a trust.  
15

16 98. The Protected Person left no written record regarding creating a trust to further her  
17 testamentary intent but moving forward with the trust at this time appears to be in line with her  
18 desires as expressed in her Will.

19 **99. Response to Guardianship Compliance Office Report.** On May 9, 2022, the  
20 Guardianship Compliance Office filed a report regarding certain financial aspects of Kimberly's  
21 tenure as Guardian, and the Successor Guardian will incur additional fees dealing with  
22 mischaracterizations and omissions of facts in the report, presumably due to the investigator's  
23 over-reliance upon Kimberly and her representations when formulating their report. Although  
24 counsel for Robyn reached out to the Compliance Office and even sent a letter outlining some  
25

1 concerns, it is noteworthy that the Compliance office never got back to counsel as promised and  
2 never engaged in a back and forth vetting of the information Kimberly provided as was  
3 contemplated in the one phone call counsel had with the compliance office early on in their  
4 investigation.

5 100. The Guardianship Compliance Office filed its report on May 9, 2022 regarding Kimberly's  
6 guardianship over the person and estate of the Protected Person. Successor Guardian intends to  
7 address said report, including having a CPA prepare a report using the same records regarding  
8 Kimberly's time as guardian. Successor Guardian requests instructions regarding preparing and  
9 filing an objection/clarification to said report, including engaging a CPA to evaluate the  
10 Compliance Report, with the understanding that Successor Guardian will seek reimbursement of  
11 fees from the guardianship estate for said action under NRS 159.344. Furthermore, Successor  
12 Guardian hereby requests that she be given copies of all materials provided by Kimberly to the  
13 Compliance Office or materials obtained by the Compliance Office in its investigation that may  
14 not have already been filed into this matter, if any, as such materials or information either belong  
15 to the protected person or relate to her.

16  
17 101. **Communication Issues with Teri.** Interested Party, Teri Butler, refuses to communicate  
18 with the Successor Guardian and has threatened to obtain a restraining order against the Successor  
19 Guardian if Successor Guardian contacts her in manner, including through phone call or text.  
20 Simultaneously, Ms. Butler continues to claim Successor Guardian is failing to facilitate visitation  
21 and communication with her. Attached hereto as Exhibit 4 are emails received from Teri making  
22 false accusations. Also attached hereto as Exhibit 5 is a letter sent by counsel for the Successor  
23 Guardian to LACSN regarding these issues with Teri which further discusses these matters. Teri's  
24 misrepresentations and unreasonable positions are causing additional fees to be incurred that need  
25

1 to be paid by the estate or Ms. Butler. The Successor Guardian seeks the Court's instructions on  
2 this matter.

3 102. Teri continues to make coordination of all communication between the Protected Person  
4 and Teri unnecessarily difficult and refuses to communicate directly with the Successor Guardian.  
5 The Successor Guardian is reluctant to have her attorneys communicate with Teri due to the  
6 continued expense caused by Teri and has directed her attorneys not to communicate with Teri  
7 except on explicit instructions from the Successor Guardian. Teri has been provided with a variety  
8 of options to communicate with June and the Successor Guardian, including the use of the Talking  
9 Parents app, and refuses to participate in any of these options. Communication between Teri and  
10 June, with assistance from the Guardian, need not involve attorneys. Successor Guardian, if  
11 instructed to do so by this Court, will have her attorneys communicate with Teri, with the  
12 understanding that Successor Guardian will then petition for reimbursement of all fees and costs  
13 related to this issue under NRS 159.344.  
14

15 103. Despite Successor Guardian's and Teri's feeling towards one another, Successor Guardian  
16 feels that June would benefit from a continued relationship with Teri and desires direction on how  
17 to best accomplish this result.

18 104. **Petition for Recovery from Kimberly.** Successor Guardian believes that Kimberly  
19 exploited the guardianship estate during her tenure as guardian and took guardianship funds for  
20 her personal use. NRS 159.305(1) sets forth the following:

- 21 1. If a guardian, interested person, protected person or proposed protected person  
22 petitions the court upon oath alleging:  
23 (a) That a person has or is suspected to have concealed, converted to his or her own  
24 use, conveyed away or otherwise disposed of any money, good, chattel or effect of  
25 the protected person; or  
(b) That the person has in his or her possession or knowledge any deed,  
conveyance, bond, contract or other writing which contains evidence of, or tends to



1 disclose the right, title or interest of the protected person or proposed protected  
2 person in or to, any real or personal property, or any claim or demand,  
3 ➔ the judge may cause the person to be cited to appear before the district court to answer,  
4 upon oath, upon the matter of the petition.

5 105. From the initial review of the Compliance Office's report, much, if not most, of the funds  
6 for the remodel of the Anaheim Property were spent without legitimate records. Large amounts of  
7 money went to Kimberly's boyfriend and to day laborers for what was a sloppy and poor job that  
8 now needs to be repaired. The risk of giving the work to the boyfriend and his friends who might  
9 not be licensed contractors was the subject of argument at past hearings in this matter and the Court  
10 expressly counseled Kimberly to utilize appropriate contractors to ensure the work was done  
11 properly. Kimberly spent substantial amounts for what appears to be Kimberly's benefit, not  
12 June's. Successor Guardian requests instructions from this Court regarding engaging a CPA to  
13 assist in assessing the amount of funds to be recovered. Successor Guardian requests that with the  
14 filing of such a petition that discovery would be opened so that Successor Guardian could subpoena  
15 documents from various entities that might have records. Successor Guardian intends to seek a  
16 recovery of said funds and would like instructions from this Court to prepare such a petition under  
17 NRS 159.305 and to seek reimbursement under NRS 159.344 for fees and costs for such a petition.

18 106. Despite Successor Guardian's and Kim's feeling towards one another, Successor Guardian  
19 feels that June would benefit from a continued relationship with Kim and desires direction on how  
20 to best accomplish this result given Kimberly's lack of communication, and subject to safeguards  
21 to protect June.

22 107. **Petition to Seek Reimbursement of Attorney's Fees and Expenses.** From the  
23 commencement of this matter and repeated again in December when she resumed her role as  
24 guardian, Robyn has filed notices of her intention to seek fees. However, Robyn has always stated  
25 her desire to leave her mother's estate intact as much as possible for her mother's care. As we

1 believe the Court is aware, and as set forth in many pleadings and hearings, Robyn has always  
2 been very generous to her mother, paying for many home repairs, home renovations, vacations,  
3 travel expenses, groceries, clothing, hearing aids, additional medical care, equipment, personal  
4 care supplies, restaurants etc. So it is with reluctance, frustration, and disappointment that  
5 Successor Guardian will again be seeking fees and now plans to continue to seek fees from June's  
6 estate, especially with the Court indicating the likelihood of there being at least two more necessary  
7 evidentiary hearings regarding the Order to Show Cause and the Petition for Restriction. The  
8 additional fee requests are necessitated by the ongoing inappropriate actions of various parties,  
9 including Kimberly and the attorneys appointed to act as counsel for June, the LACSN law firm,  
10 despite ongoing objections from among others Robyn, Donna and their counsel in hearing after  
11 hearing and in pleadings about the LACSN law firm's ill-advised decisions to prolong and  
12 exponentially expand litigation to the detriment of June. These bad decisions by other actors  
13 include (1) Kimberly's penchant for feigned ignorance and passive-aggressive tactics as evidenced  
14 by her refusing to provide all sorts of information to the point of having to be found in contempt,  
15 (2) the ill-advised and self-aggrandizing legal tactics of LACSN in support of Kimberly and their  
16 own agenda throughout the past two and a half years and (3) filing not less than four frivolous  
17 appeals while at the same time never filing a single complaint or objection about Kimberly's  
18 misconduct, nor to even a single line of her approximately \$90,000 fee request, nor to even a single  
19 entry of Kimberly's counsel's approximately \$100,000 fee request.  
20

21 108. It is Successor Guardian's position that her expenditures seeking to protect her mother have  
22 uncovered a great deal of obfuscation, exploitation and isolation by the prior Guardian, Kimberly  
23 Jones, despite Kimberly attempting to hide her wrongdoings behind a façade of ignorance and  
24 non-responsiveness.  
25

1 109. Successor Guardian intends to seek reimbursement of attorney's fees and costs under NRS  
2 159.344. Successor Guardian seeks instructions from this Court to prepare such a petition, with  
3 the understanding that Successor Guardian will petition for reimbursement of all fees and costs  
4 related to this issue under NRS 159.344.

5 **Relief Requested**

6 **WHEREFORE**, Guardian requests:

7 1. That this Court replace Legal Aid Center of Southern Nevada with private counsel, to be  
8 paid from assets of the estate, subject to Court confirmation.

9 2. Alternatively, should the Court allow Legal Aid Center of Southern Nevada to continue as  
10 court-appointed attorneys for June, that the Court revise its order appointing LACSN by limiting  
11 its representation of June to only protecting her due process rights as set forth in Statewide Rules  
12 for Guardianship 9(I).

13 3. That this Court provide guidance and instructions to Successor Guardian regarding  
14 supervised visits between June and Legal Aid Center of Southern Nevada.

15 4. That this Court re-appoint Elizabeth Brickfield, Esq. as a Guardian ad Litem, to serve June  
16 indefinitely, as allowed under NRS 159.0455, to provide the Court with information and advice to  
17 protect and advance June's best interests. Guardian ad Litem is to be paid from assets of the estate,  
18 subject to Court confirmation.

19 5. That this Court provide guidance and instructions to Successor Guardian regarding using  
20 guardianship funds to pay for legal services prior to expending fees on the same, so as to avoid  
21 unnecessary expenditures.  
22  
23  
24  
25

1       6. That this Court instruct the Successor Guardian regarding the evidentiary hearings on the  
2       Petition to Enforce and the Petition to Restrict in light of Successor Guardian's intent to seek  
3       reimbursement of fees and costs from the estate related to these matters under NRS 159.344.

4       7. That this Court instruct the Successor Guardian regarding preparation of a trust and filing  
5       a petition to create a trust under NRS 159.078.1(c) and regarding whether Successor Guardian may  
6       petition the Court for reimbursement of fees and costs related to the creation of the trust under  
7       NRS 159.344.

8       8. That this Court instruct the Successor Guardian regarding preparing and filing an  
9       appropriate objection to the Compliance Office's report for Kimberly's tenure as guardian,  
10      including utilizing a CPA to analyze the report and exhibits, and petition this Court for  
11      reimbursement of fees and costs related to this matter under NRS 159.344.

12      9. That this Court authorize Successor Guardian to receive copies of all materials provided  
13      by Kimberly to the Compliance Office or materials obtained by the Compliance Office in its  
14      investigation that have not already been filed, if any, as such materials or information either belong  
15      to the protected person or relate to her.

16      10. That this Court instruct the Successor Guardian regarding utilizing counsel to deal with  
17      communication issues with Teri and seeking reimbursement of such fees and costs from the  
18      guardianship estate.

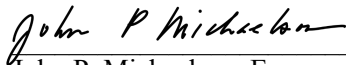
19      11. That this Court instruct the Successor Guardian regarding utilizing counsel to file a petition  
20      for recovery from Kimberly of guardianship estate funds Kimberly used for her own benefit and  
21      not for June's under NRS 159.305, including utilizing a CPA to prepare such a petition, in addition  
22      to seeking reimbursement of fees and costs from the guardianship estate under NRS 159.344 for  
23      this issue.  
24  
25

1 12. That this Court instruct the Successor Guardian regarding utilizing counsel to file a petition  
2 for attorney's fees and costs she has incurred in this matter under NRS 15.344.

3 13. That this Court order such other and further relief as it deems appropriate.

4 DATED: July 28, 2022.

5 MICHAELSON LAW

6 

7 John P. Michaelson, Esq.

8 Nevada Bar No. 7822

9 Peter R. Pratt, Esq.

10 Nevada Bar No. 6458

11 1746 West Horizon Ridge Parkway

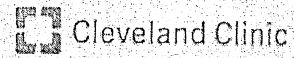
12 Henderson, Nevada 89012

13 Counsel for Guardian

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/s/ Robyn Friedman  
Robyn Friedman

# Exhibit 1



Lou Ruvo Center for Brain Health  
888 West Bonneville Avenue  
Las Vegas, NV 89106  
Phone: (702) 483-6000  
Fax: (702) 483-6039

September 5, 2019

Re: June Jones

To whom it may concern:

June Jones has been seen for neurological evaluation at the Lou Ruvo Center for Brain Health. Mrs. Jones has a degenerative neurological disorder resulting in impairment of memory, judgment and other cognitive functions. She is not capable of handling her own affairs, including medical, financial, and legal decisions, and requires a guardian.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS', enclosed within a large, loopy circular flourish.

Marwan Sabbagh, MD



# Exhibit 2

July 9, 2022

Elizabeth Mikesell  
Legal Aid of Southern Nevada  
725 E. Charleston Blvd  
Las Vegas, NV 89104

Re: G-19-052263-A  
In the Matter Guardianship of the Person and Estate of Kathleen June Jones

Dear Ms. Mikesell,

On behalf of Kathleen June Jones, the Protected Person (“June” or “Ms. Jones”) in the above-referenced matter, the Guardian Robyn Friedman (“the Guardian”) hereby request that the law firm of Legal Aid Center of Southern Nevada (“LACSN”) petition the Court to withdraw from further representation of Ms. Jones and seek appointment of a private attorney under NRS 159.0485 and join with the Guardian to seek the appointment of a guardian ad litem to look after June’s best interests.

LACSN is authorized under NRS 159.0485 to represent indigent protected persons and is allowed to seek the appointment of a private attorney under NRS 159.0485(3) for protected persons who have assets. LACSN has known since nearly the beginning of the guardianship that June had significant but not inexhaustible assets allowing her to pay for her own counsel. Accordingly, Robyn Friedman as Guardian of the Person and Estate of June requests that LACSN file a petition for its withdrawal as court-appointed attorneys in this action and to have private counsel appointed.

Nevada Statewide Rules for Guardianship Rule 9 establishes requirements for lawyers for protected persons, including LACSN. Rule 9(I) requires any appointed counsel, including LACSN, when the protected person is unable to express or communicate his or her wishes to the court-appointed attorney or maintain, as far as reasonably possible, a normal client-attorney relationship, to only protect the legal interests and due process rights of the protect person, and it suggests to a court-appointed attorney – such as LACSN - to seek the appointment of a guardian ad litem in order to advocate for the best interests of the protected person in such cases.

This guidance to attorneys and protections for incapacitated clients is further guaranteed by the Nevada Rules of Professional Conduct (“NRPC”). As lawyers practicing in Nevada, LACSN must abide by NRPC 1.14 in attempting to maintain an attorney-client relationship with persons with diminished capacity, which includes seeking the appointment of a guardian ad litem to advocate for their best interests when a client can no longer participate in legal representation. The process for protecting protected persons is extremely important when court-appointed counsel such as LACSN is forced to accept a framework that is specifically NOT the best interests of the protected person but instead is purported to be whatever the protected person requests even if the protected

person is suffering from diminished capacity and may be making requests for legal or other action that is not in their best interest or that is not based in reality.

Instead of petitioning or otherwise advocating for a guardian ad litem, LACSN has failed to recognize or accept June's actual diminished capacity and has repeatedly misrepresented her capacity. For example, **Dr. Brown's reports of 2019 and 2021 (well known to LACSN throughout this litigation and attached hereto again for reference) along other reports in the record clearly demonstrate that Kathleen June Jones suffers from dementia and lacks capacity to direct any legal action or perform other needed tasks such as comprehending whom she has or hasn't seen and when.** Dr. Brown's findings are completely consistent with statements of all family members at many hearings in this matter, including both the current and former guardians as well as arguments and points and authorities provided by both guardians' counsel, findings of the Court, and repeated statements of the LACSN law firm's own attorneys – all recognizing that June lacks capacity to direct her schedule, let alone numerous sophisticated and extremely expensive legal appeals by the LACSN law firm to the Supreme Court.

During the tenure of the prior guardian, Kimberly Jones ("Kim" or "Kimberly"), LACSN should have been working to protect June and her estate from abuse and mismanagement. However, LACSN did not even object to any of Kimberly's requests for guardian's fees and costs. And more surprising, LACSN did not object to any of Kimberly's request for attorney's fees and costs, even though the Court verbally and in writing repeatedly expressed frustration and disappointment with Kimberly's conduct as guardian, as represented and supported by her attorney. Throughout these proceedings, LACSN has been silent in the face of Kimberly's continuous misconduct, and in virtually all instances and circumstances has supported and encouraged her despite an ongoing barrage of information indicating she was not properly accounting for June's finances, not protecting June medically and weaponizing her position as guardian to isolate June from family members who opposed her. LACSN makes it a central tenet of its existence to oppose line by line legitimate fees and costs sought by virtually any law firm, including this one, on nearly every case. And yet, in this case, where Kimberly asked for \$90,000 in guardian's fees for 18 months of work and Kimberly's attorney asked for \$101,558.24 in attorney's fees and costs, LACSN did not have one single objection, not even to one single entry in either Kimberly's fee requests or to her attorney's requests for fees and costs, despite Kimberly's attorney's lack of adherence to statutory requirements for the award of attorney's fees under NRS 159 and despite the many problems with Kimberly's accounting and general conduct as guardian.

LACSN did not express any concern about Kimberly's faulty first accounting. LACSN figuratively didn't even bat an eyelash when it was shown in the evidentiary hearing that Kimberly had doctored her text message disclosures to remove over 90 instances of Robyn attempting to communicate with Kim. LACSN would not join in requesting that the record be supplemented. Throughout these proceedings, LACSN aided in Kimberly's further isolation of June and filed a petition to limit the family's contact with June to a few hours a week, something everyone testified was totally out of character for June at any point in her life.

LACSN went so far as to file a writ to prevent June from having the opportunity to testify in court or to be canvassed by the Court, representing that June directed it, even though June did not possess the capacity to direct nearly anything at that time (especially very costly and time consuming and complex last-minute legal maneuvers) and notwithstanding the Protected Person's Bill of Rights

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guaranteeing June the right to speak and to have a say in a court proceeding centered on her. LACSN's own training manual for its attorneys explicitly recommends having the Protected Person testify, but contrary to good judgment and the law and its own policies, LACSN vehemently prevented that.

LACSN has now filed its fourth appeal to the Nevada Supreme Court in this matter, this time over approximately \$5700 in Guardian Ad Litem fees, even though LACSN knows these appeals are very costly to parties in this litigation, including June. LACSN claimed that June opposed a Guardian Ad Litem being appointed, yet June lacked capacity to direct her court appointed attorney to do so or to understand what such a position would mean for her, and June was prevented from expressing her wishes to the Court. In other words, LACSN has fought bitterly to prevent June from having representation, including a guardian ad litem, focused on her best interests, as opposed to solely being represented by LACSN, which strenuously argues it does NOT represent June's best interests.

Contrary to the recent Case Appeal Statement, June did not disagree with the findings of the Guardian Ad Litem. LACSN did.

Rather than advocate for June's expressed wishes or protect June's legal interests or June's due process rights, LACSN followed a course of action consistently advocating for what appeared to be its own positions rather than as directed by a client with capacity to direct and understand the consequences of catastrophically expensive litigation and appeals, which capacity June categorically has not had for years, including the timeframe of LACSN's involvement. LACSN failed to protect June from the prior guardian Kimberly, whom the Court found in a lengthy and detailed order, isolated June in violation of her rights and failed to properly account for her estate, also in violation of June's rights. LACSN failed to file any petitions against Kimberly at any time or oppose petitions filed by Kimberly. LACSN failed to join any petition or action that could in any way rein Kimberly in until the recent petition for instructions regarding the Anaheim Property, and that was only after LACSN was specifically called out in the hearing for failing to protect June. LACSN similarly failed to protect June from Dick and Gerry Powell.

Since all the testimony, reports and findings in this matter support that June lacks capacity to process and oversee even her own schedule or to operate a phone, let alone the determination of whether or not to file any legal document, including especially to truly appreciate the costly and extremely time-consuming nature of these appeals and the impact on her estate, LACSN should also withdraw the appeals it has filed in June's name.

Furthermore, the Guardian intends to no longer have the protected person meet privately with LACSN personnel or representatives because Guardian believes that LACSN may be weaponizing the protected person's statements where the protected person lacks the ability to understand the consequences of the actions LACSN is taking and that LACSN may be misrepresenting the protected person's capacity. If LACSN disagrees with the Guardian being present, just as LACSN insisted on being present with the protected person while she was interviewed by the guardian ad litem, then the Guardian will seek the Court's instruction on this matter.

Please indicate promptly whether LACSN will voluntarily seek permission to withdraw or whether the guardian will need to petition for the same to protect June's best interests.

Sincerely,

A handwritten signature in black ink that reads "John P. Michaelson". The signature is written in a cursive, flowing style.

John Michaelson, Esq.

# Exhibit 3

**From:** Debra Bookout <dbookout@lacs.org>  
**Sent:** Monday, July 25, 2022 10:56 AM  
**To:** John Michaelson  
**Cc:** Elizabeth Mikesell; Jim Berchtold  
**Subject:** In re Kathleen June Jones

Mr. Michaelson,

I have received your letter dated July 9, 2022 wherein your client demands that Legal Aid Center of Southern Nevada, Inc. withdraw from representing Ms. June Jones. Legal Aid Center will not be withdrawing from representation of Ms. Jones.

In this letter, you also note that your client "intends to no longer have [June] meet privately" with Legal Aid Center counsel. Please confirm that this is your client's position, as we will need to discuss the recently filed Petition for Authority to Sell Real Property with her.

Debra A. Bookout



Debra A. Bookout, Esq.  
Attorney, Consumer Rights Project  
Legal Aid Center of Southern Nevada, Inc.  
725 E. Charleston Blvd.  
Las Vegas, NV 89104  
702-386-1452 direct/fax  
702-386-1070 ext. 1452  
[dbookout@lacs.org](mailto:dbookout@lacs.org)  
[www.lacs.org](http://www.lacs.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.*

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# Exhibit 4



**From:** [Teri Butler](#)  
**To:** [John Michaelson](#)  
**Subject:** Talking to June Jone  
**Date:** Thursday, March 10, 2022 4:54:10 AM

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And yet again Robyn has Proved,I can't get to talk to my mom! You are the one who set the appointment to talk to my mom at 6 PM on Wednesday night. I called my mom and I got a hold of her assistant,Not my mom. My mom was !buying a new cell phone at Verizon with Robyn and her assistant. Unable to talk to me. At 6:35 the assistant texted me and said do I want to talk to my mom her on her phone! Of course I want to talk to my mom ,don't really wanted to do it in a Verizon store with Robyns and her assistant listening to my conversation The court said reasonable communication and I am not getting that ,and you were the one who set ,The date and the time.  
I am not happy!

Teri Butler

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Sent from Gmail Mobile

**From:** [Teri Butler](#)  
**To:** [John Michaelson](#)  
**Subject:** Re: Kathleen June Jones  
**Date:** Tuesday, March 8, 2022 2:56:25 AM  
**Attachments:** [image001.png](#)

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Mr Michaelson

Yet again you and your Client Has caused myself and my daughter Jennifer. to fight again, I told you not to get her involved! I will not be seeing my mom in April for I work and I do not have thousands or millions of dollars like my sister does to hop on a plane and see my mom or my kids in April. 2. Since when do I have to be put on schedule to talk to my mom ? Reasonable communication is what the court said! Where is my mom's Apple Watch? Robyn wants to record my phone calls that's why she wants to see put me on the schedule to talk to my mom. I will not allow her to do to me , what is Robyn is doing to Kim causing thousands of unwanted law bills that I can't afford and she knows this! You're right the corporate Robyn in charge! and my mom has gotten so bad that she can't push a button on a watch to talk to her daughter! Good job Robyn!

Teri Butler

On Mon, Mar 7, 2022 at 6:55 PM John Michaelson <[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)> wrote:

Hi Teri,

As we have informed you on numerous occasions, your mother struggles and really can't answer the phone or make outbound calls without assistance. Robyn has hired a caregiver to assist with June's care and although she is not at June's side literally all the time, she can assist when Robyn isn't there in helping her answer calls. Robyn has also provided you with June's schedule. We are endeavoring to make communication as easy as possible. By coordinating with Robyn, she or the assistant can ensure that June can answer the phone when you intend to call.

No one tried to destroy Kim. Her errors and problems were of her creation. And no one is trying to take revenge upon you, no matter your concerns.

Robyn has tried to communicate through Jen because you refused to communicate with Robyn who is the guardian. Robyn sent videos to Jen to forward to you. And, at Jen's request, Robyn is working to schedule a trip for June to California in April to have a visit - without Robyn there – at a time when we understand you will be there.

Since June is not able to make calls or answer them on her own, there will be times that Robyn as guardian will be there to assist June. Hanging up on your elderly mother after a few seconds when she acknowledges Robyn is in the room – because she is making sure June is able to communicate with you - is not in June's best interests. Robyn will leave the room but needs a few seconds to make sure you two are in fact connected on the phone call.

Robyn did inform me that you had a phone call with your mom almost immediately after you hung up on June. Robyn went and got the assistant to help June to call you back so Robyn was not in the room. Likewise, the assistant can help June make text messages.

If you choose not to take phone calls from your mother, that is your choice. But doing so represents your refusal to communicate with your mom, not Robyn's interference with your communication. No matter your stated intention not to take phone calls from June, Robyn plans to assist her to call you every Wednesday at 6 pm. This is not a limitation on your communication, but rather an effort to ensure communication with you. You may still call at any other time and efforts will be made to assist June in answering the phone.

As to your other allegations, they are utterly without merit.

Rather than focus on your anger and hatred, Robyn is trying to do what she can to assist and care for June. The Court made Robyn June's guardian because the judge determined that Robyn was the best choice. The Court decided Robyn is trustworthy.

Kimberly has refused to leave the Anaheim house, which is in immediate need of repairs. The work Kimberly had done on the house is already failing. To our knowledge, Kimberly is still in the house even though the judge ordered her to turn over the keys in December. Kim said she would be out around January 8, then unilaterally extended to February 15, then unilaterally has said she won't leave until at least March 15.

The house will be put to good use after it is repaired properly. The court is required to approve any leasing or selling of the property. We do not know what Kimberly may have told you, but Kimberly claims to have collected only \$12,500 in rent after she evicted Scott. Incidentally, she never sought or received permission from the Court to lease out the property, which a guardian is supposed to do. Kimberly never has paid rent on the property herself.

The only reason for the substantial litigation in this matter is that people are unreasonable and have exploited June. It started with Dick and Kandi taking June, taking the Kraft house, cancelling June's medical appointments, interfering with her medical care, taking her dogs, etc. Kimberly could not protect June even with the Power of Attorney. Robyn and Donna only sought a temporary guardianship because Kimberly had failed to protect June from exploitation even with the Power of Attorney. Robyn and Donna supported Kimberly to be Guardian once she agreed to step up and do it. This was to bring transparency and safety for June regarding her finances and her well-being.

Once she was guardian, Kimberly repeatedly caused problems with communication and interaction. The Court found that Kimberly violated her duties and could not serve as guardian anymore. Kimberly also failed to do a proper accounting and the court found that thousands of dollars spent by Kimberly are completely unaccounted for by Kimberly. The full extent of what Kimberly improperly spent is yet to be determined.

Some of the litigation in this matter resulted from Maria as well, including her three appeals. Maria has consistently represented that June is capable of communicating on her own behalf, even though that is contrary to reality.

Since becoming Successor Guardian, Robyn has been forced to file additional petitions because Kimberly has refused to follow simple rules and court orders.

No fees have been paid out of June's estate. Most of the fees sought in the case were from Kimberly and her attorneys, which were denied. The only award for fees – claimed by Robyn and only to be collected after June has passed away if there is anything left - has been upheld by the appeals court.

After everything is resolved regarding Kimberly's time as guardian, there should be far less litigation going forward. Robyn will continue to work so that June has communication with all her children and grandchildren.

Again, June's limitations will require Robyn to assist June in communicating with June's family. You are in no way limited in contacting June, except for June's limitations. Please work with us and Robyn to ensure you have regular phone calls with June and get to see her in person.

**John Paul Michaelson**

Managing Partner

Office: 702.731.2333 | Fax: 702.731.2337



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

Michaelson Law

1746 W Horizon Ridge Pkwy, Henderson, NV 89012

**[www.michaelsonlaw.com](http://www.michaelsonlaw.com)**

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Sent from Gmail Mobile

**From:** Teri Butler  
**To:** John Michaelson  
**Subject:** visiting June Jones  
**Date:** Tuesday, March 8, 2022 3:50:35 AM

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Mr Michaelson!

Yet again you and your client has caused myself and my daughter Jennifer to fight again! I told you not to get her involved! When I see my mom, I will ask Jennifer or Jon to help! not Robyn's lawyer! I saw my mom when Scott did not for 17 months Donna and Robyn were playing gaming with Kim and So no, I will not be seeing my mom in April! I have to work. I don't have millions of dollars to hop on a plane to see my mom, like my sister Robyn has. Reasonable communication is what the court said. Without Robyn being in the room so she can record my visit !Where is my mom's apple watch? Robyn is trying to keep me from talking to June Jones. You are right, the court said Robyn is in charge! June Jones has gotten so bad that she can't push a button on an apple watch to talk to her daughter? Good job Robyn! I go to bed at 7pm, I wake up at 3am. I do not like a phone call by Jennifer telling me about her talking to Robyn's lawyer. I don't have time to write an email to you!

Teri Butler

**From:** [Teri Butler](#)  
**To:** [John Michaelson](#)  
**Subject:** Robyn not allowing to talk to my mom  
**Date:** Saturday, March 5, 2022 8:22:38 PM  
**Attachments:** [mom text.PNG](#)  
[mom text 2.PNG](#)

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Mr. Michaelson!

Yet again Robyn has proven that I can't have a one-minute conversation with June Jones without her being in the room! I am attaching the text I received from my mom's phone. I know the assistant did not text this! That person would have given me a name before telling me that she was texting for my mom! I know my mom can't put more than two or three words together in a sentence. I know this is Robyn by the way she texts. I am sure you have many examples of Robyn's text messages, but I will be more than happy to send you a text. Robyn wants revenge for me siding with mom and her wanting to live in her house with Kim. She has made that clear! Robyn is trying to destroy me like she is doing to Kim, I will not allow that to happen me. It is sad that Robyn will not allow one of her daughters to talk to their mother! Where is mom's apple watch?

I misrepresented what Tiffany O'Neil text to me, on Friday March 4. I asked Tiffany if Robyn had called her about the flash drive in the last few days. Tiffany texted back "Robyn called me months and months ago! And I told Robyn I never received a flash drive". I know that Robyn sent everyone in the family a flash drive! What happened to Tiffany's drive? And who has it? Now you know why I want those drives back. Scott will also be wanting those flash drives back too!

I will not be receiving any more calls from Robyn, or my mom! At this point she has proven she can't be trusted, and now only wants to show the court that she is doing what the court is asking. So, she looks good!

I also think that Robyn is trying to take mom's house away from Donna, Scott, Kim and me, by eating up the cost of the house with your lawyer fees. The Anaheim house can be rented out for \$1500-\$2500, a week, as a bed and breakfast. Due to the house's location. The house is 10 min from Disneyland, 10 min from Angel Stadium, 10 min from the Pond of Anaheim, 30 min from Newport Beach! Kim rented out the house to bring income in for mom, and now the house sits empty. In addition, per mom's will the house is to be split 5 ways when she eventually passes.

The priority should be to follow the instructions of the last will and testament as my mom wishes. Realizing that all the lawyer fees are due to Robyn file this hideous lawsuit and completely going against mom's wishes.

Teri Butler

**From:** Teri Butler  
**To:** John Michaelson  
**Subject:** Re: visitation with Kathleen June Jones  
**Date:** Friday, March 4, 2022 9:12:25 AM

---

Robyn has lied to you again, not surprising, since much of her accusations lack evidence or proof. I just talked to Jonathan Criss, Tiffany O'Neal and Scott Simmons, and he is pissed! Not only is his birth certificate on that flash drive, but so is his social security number. So, no! that does not work for me. What else is your client lying about. Someone in this family stole Rachel's birth certificate and social security number and sold them. I did not find out until I received a W-2 for a place Rachel never worked. Called the IRS, gave them the death certificate and they caught the person who bought it and deported her. I had that box open for less than 30 minutes when Robyn threatened to sue me! As you know, since the letter to cease and desist came from you. So, no! I don't know what was in that box. And I have witnesses to prove that. Robyn is vindictive and controlling. I knew she would call you and threaten to sue me, so I stopped going through the pictures. If I had gone through them, I would have pulled them out and sent them to the person that they belong to, not the whole family!

If Robyn would lie about Scott's and Donna's and my personal information, how can I believe she would not record my phone call! I have seen her record conversations with doctors, law enforcement and even lawyers. I watched her pull up the video surveillance at her house, with a quest in her house! My daughter Jennifer doesn't want to be involved in this, for Robyn might take her to court or sue her! We have gotten into fights about this matter, and I won't involve her again.

I want a reasonable conversation with my mom! And I am not receiving it! I have called my mom's phone, or I get this Monday thru Friday and not gotten through, and one call back at 7:30 when I was sleeping. I get up at 3:00 am. If June can go see her Daughter Donna for a week, why can't she push a button on her phone? That is why Kim got mom an apple watch so mom can feel it go off! And why is Robyn keeping her from answering her phone? Is my mom in prison? Again, I heard Robyn say to my mom "You don't get to decide what you wear, what you eat or where you go! the court gave me that right!" So, no! That doesn't work for me, and Robyn just wants to look good in court! Does it not seem strange that while under Kim's care the apple watch performed as it was designed? We were able to call mom and she would answer! Why is Robyn not allowing me to talk to June Jones, my mother? Is this her way of getting back at me?

You make it sound as though my mom has deteriorated to the point, she is not able to pick up the phone and answer it?

The best solution would be to charge the watch and give to my mom ASAP! In addition, have your client retrieve all copies of the flash drive and send them to me so I can destroy them. You need to understand that if I had finished the job this would not be an issue. In case your client did not tell you, she had her assistant go through those boxes and make the flash drives. Robyn DID NOT take the time to know what was being put on them.

Teri Butler

On Wed, Mar 2, 2022 at 4:53 PM John Michaelson <[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)> wrote:

Dear Teri,

I appreciate your concerns. I want to address the issue of visitation. Your mom is unable to answer or initiate calls. A phone could be sitting next to her, and she wouldn't know what to



do with it, most, or even all, of the time. Due to this, we are needing to arrange a time for you to call when someone can be near June to help. We will make sure your conversation is private, but someone has to make sure she gets the call and is talking with you before they leave the room.

You are welcome to make calls to your mom's phone at any time, but there are times that would be best so June can receive that assistance. June's typical schedule is as follows:

Weekdays:

- 7:00 am: Wake up
- 7:00 – 9:30 am: Breakfast/reading
- 9:30 am - 6:30 pm Caregiver arrives (this is when someone would be able to check her phone and assist with the phone calls)
- 6:30 pm – Reading and going to bed.

Weekends:

- Typically, a later wakeup
- 12:00 – 6:30 pm Errands/Hangout Time (this is also when someone would be able to check her phone and assist with the phone calls)

If any missed calls occur throughout the day, those will be checked daily at 6:30 pm and returned around that time (unless it is her brother/sister-in-law due to time difference, those will be answered the next day). Robyn was unaware of June's voicemail box being full, but that is addressed and will continue to be addressed and resolved as she does not pick up calls as they come in.

Regarding visits, Robyn is willing to coordinate them. June would love to see you. Could we coordinate a visit in the next couple of months? Robyn has offered to schedule it, or you can schedule it as well. We know that previously scheduling has occurred through your daughter Jen. Would you like that to continue? What would you propose?

Regarding the issue of the social security number and picture being circulated, Robyn has asked each family member to delete those. We hope that will suffice. As you are aware, the boxes containing these items were left with you for a time and you were going through them. Presumably, you either knew of these items or missed it just as Robyn did. In coordination with you all, she was trying to make copies of some of the family mementos since at the time it was not known if June's things would be confiscated by Gerry's family at a moment's notice as they were threatening to evict Kim at any time.

Please let me know what you propose moving forward. Also, I would love to talk with you

and/or your husband (I know he has represented you at the hearings) personally to try to work something out. We are anxious for you to see your mother and she wants to talk and I'm sure visit with you.

Sincerely,

John P. Michaelson, Esq. | Michaelson Law | [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com) | 702.731.2333

**From:** Teri Butler <[terijbutler@gmail.com](mailto:terijbutler@gmail.com)>  
**Sent:** Saturday, February 26, 2022 2:28 PM  
**To:** John Michaelson <[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)>  
**Subject:** Re: visitation with Kathleen June Jones

I do think you and Robyn are trying to put me on a schedule, so I can talk to my mom! Robyn wants to record my conversation with my mom and use it against me in court, like she is doing to Kim. I work as you and Robyn know. I drive a school bus, and there is a shortage of school bus drivers. I can't get time off with a 14-hour notice, the one and only time Robyn invited me to see my mom, to have dinner in Newport beach California at 6pm on a Friday! It's a 6-to-8-hour drive. If Robyn wanted me to come to see my mom, she would have given me more notice. When I see my mom, it will be with other people around so I can have witnesses to what was said. I don't trust Robyn; she has shown on many occasions. For example, she put my personal information on a flash drives, then sent it out to people in my family, who will and can use it to get money and doesn't care who it affects. I will not put myself in that situation ever again!

1. I should not have to go through my daughter to talk to my mom or put her in the middle, it is causing a problem with Jen. My mother's cell phone should be turned on.

2. I can't schedule a time to call my mom, since I don't always know when I am needed to drive. Additionally, give Robyn the opportunity to turn on the surveillance and voice recording to listen to conversation, and the phone works both ways.

3. My mom can not be put on a plane by herself as Robyn knows. That is not an option. There are no flights into Prescott airport from Las Vegas. She would have to fly to Phoenix and that is a 2 hour drive each way.

4. Robyn dropping my mom off is not an option, Robyn will be waiting to record my visit. Robyn has proved to be vindictive in getting what she wants, as she is doing to Kim.

I said everything that I needed to say to my mom. Scott did not see my mom for 17 months, or call or talk to her and while Donna and Robyn were playing games with Kim about seeing and talking to my mom. I will have no regrets! I visited my mom during this time.

Is Robyn saying that my mom can't push a button on a cell phone or tell Robyn she wants to talk to me. Why is my mom's phone going straight to voicemail and it is full? I have called my mom multiple times, in the past three weeks, and have not gotten through nor has she

called me back.

These options don't work for me. Robyn is supposed to have her cell phone turned on, so when I call, and when she wants to call me, we can. I feel Robyn is not going to allow me to talk or see my mom and if she does it is to try to destroy my life, like she is doing to Kim or look good in court.

I can call my mom on Monday through Friday after 9am to 11:30am and again from 5pm to 7pm. All day Saturday and Sunday, my mom can call me during these times. If Robyn will allow that to happen! I will see my mother when and if Jonathan Criss or Jennifer Adamo go visit and they can bring her to me, again so I have witness.

Teri Butler

02/26/2022

On Fri, Feb 25, 2022 at 10:23 AM Teri Butler <[terijbutler@gmail.com](mailto:terijbutler@gmail.com)> wrote:

----- Forwarded message -----

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

Date: Fri, Feb 25, 2022 at 9:27 AM

Subject: RE: visitation with Kathleen June Jones

To: Teri Butler <[terijbutler@gmail.com](mailto:terijbutler@gmail.com)>

CC: Ammon Francom <[Ammon@michaelsonlaw.com](mailto:Ammon@michaelsonlaw.com)>, Heather Ranck <[heather@michaelsonlaw.com](mailto:heather@michaelsonlaw.com)>

Teri,

We believe you have misunderstood the intent of us reaching out. We are not trying to put you on any restricted schedule for speaking with your mother. But for it to work, you need to help us find specific times that work best for you. Calling June at random times may result in her not being able to answer.

In reality we are reaching out because Jack repeatedly has said in court that you feel you will never see June again. We are reaching out to you to encourage you to understand that we want to make sure you DO see June and ideally sometime soon, as we know June would want to see you.

When would you like to actually see June? In other words, we are trying to plan a time for

June to see you, in a time and place that works for you. When would that be? Or, are you saying for now phone calls would be better? We want to make sure calls are not missed so if we could setup a time for that Robyn will make sure June is available and ready for a private conversation with you. June cannot coordinate this on her own.

Again, with respect, you did not answer the questions in our email to you below.

Robyn wants to do whatever it takes, that is realistic and within reason, to ensure you have good access to your mother.

Thanks,

John P. Michaelson, Esq. | Michaelson Law | [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com) | [702.731.2333](tel:702.731.2333)

---

**From:** Teri Butler <[terijbutler@gmail.com](mailto:terijbutler@gmail.com)>  
**Sent:** Saturday, February 19, 2022 1:36 PM  
**To:** John Michaelson <[john@Michaelsonlaw.com](mailto:john@Michaelsonlaw.com)>  
**Cc:** Ammon Francom <[Ammon@Michaelsonlaw.com](mailto:Ammon@Michaelsonlaw.com)>; Heather Ranck <[heather@Michaelsonlaw.com](mailto:heather@Michaelsonlaw.com)>  
**Subject:** Re: visitation with Kathleen June Jones

John Michaelson

Tell Robyn Friedman that I want what the court awarded previously, when Kim Jones was taking care

of June Jones. Reasonable communications with June Jones (my Mother). 8 am to 8 pm. Fom Monday

through Sunday. I am sure you know the court order and what it says, better than I since Robyn was the one who asked for it.

Her cell phone or apple watch is supposed to be turned on, so if I want to talk to my mom, I can call her during those hours. I work

as a school bus driver so the only time I can call mom is from 9 am to 11 am and then again from 5 pm to 7 pm Monday through Friday,

and all day Saturday and Sunday. So far I have called my mom's phone for the last weeks and have got her voicemail.

It was not till the day I received this email that I got a call back from my mom , that lasted less than a minute, Which tells me your client is not

allowing me reasonable communications with June Jones. I called today Sat Feb 19 at 10 am and it went straight to voicemail

and her mailbox was full. Which also means all the voicemails of people calling my mom are not being returned.

This is a formal request for the paper that has my social security number on it and the picture of me in a tutu. Both which Robyn

copied on to flash drives sent to people in my family, that will or could be used against me. My mom told me she would destroy

all copies of that picture,for personal reasons no one in my family needs to know but me and my mom. But if I have to tell the court,

Robyn would not like it. So please tell her to return the picture and my social security number and any and all copies of them .

This is the Third time I have asked, Robyn has told me NO two times before. How can Robyn be responsible for my mom

personal information when she has sent out flash drives with My social security number, Donna's social security number and

Scott's birth certificate. Even if her assistants copied and sent them out , Robyn paid them and is ultimately responsible.

Since you sent me the stop and desist letter,about the box of pictures, which I did return . My personal information does not belong to my

family. I want them back. Before I seek other means of getting those back, or telling the court what other things Robyn has done.Like yelling

at my mom and tell her she can't make any decisions, the court gave me that right! I heard her say while on the phone,

You obviously know if the situation were reversed she would have me in court before the day was over!

I want nothing more to do with Robyn.until she returns my information and the flash drives! Only her assurance that I can call my mom as needed during the proposed times.

Teri Butler

On Wed, Feb 16, 2022 at 10:10 AM John Michaelson <[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)> wrote:

Mrs. Teri Butler,

Our client, Robyn Friedman, wants you to have full access with Kathleen June Jones in whatever way works best for you.

If you do not want to work through Robyn directly to schedule, please let your daughter, Jen, schedule times for you to speak with/visit June. There are several options Robyn wants us to communicate to you:

1. Three-way conference calls with you, Jen and June.
2. Jen schedules a time for you to call June and Robyn will help make sure someone helps June answers your call.
3. Robyn will fly June to you, and arrange for you to pick her up curbside at the airport.
4. Robyn will have June dropped off in Las Vegas to wherever you may want to stay here. Robyn can have other people do the drop-offs.

Please let us know how you would like to communicate with June, whether it be the options above or another way. We will forward your response to Robyn.

Best Regards,

John P. Michaelson, Esq.

MICHAELSON LAW

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

[www.michaelsonlaw.com](http://www.michaelsonlaw.com)

Tel. (702) 731-2333

Fax. (702) 731-2337

**Henderson**

1746 West Horizon Ridge Parkway

Henderson, Nevada 89012

\*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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Sent from Gmail Mobile



**From:** Jack Butler  
**To:** Maria Parra-Sandoval; John Michaelson  
**Subject:** Communication With June Jones  
**Date:** Friday, April 22, 2022 6:58:26 PM

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Mr. Michaelson,

I have tried it your way and it's not working! All I'm asking is open communications with my mom Monday through Sunday 8 AM to 8 PM. This is no different than your client Robyn insisted on having with our mother. I will not be put on a schedule that cannot be adhered too! All of a sudden my mom is not able to answer the phone without someone being there to assist her? Give me a break. I'm not asking for anything different than your client asked for when she was not the guardian I will not, again I will not be put on the schedule. I want to be able to communicate with my mom when I'm available. Currently every time I call it goes to voicemail and then I get a call back from my mom's phone while I'm at work and everyone is aware I am not able to answer the phone while driving school bus! In case you didn't get it the first few times I am not going to be put on this ridiculous schedule that cannot be followed by your client! Last week I called my mom's phone five times plus one time with my husband's phone, to no avail, all calls went to voicemail.

In addition, I want to remind you in one of your emails to me that you were not trying to put me on the schedule?? Seems to me that your client is unwilling to cooperate so that I may communicate with my mother. She is not fulfilling her duties as a true guardian.

Terry Butler

**From:** [Robyn Friedman](#)  
**To:** [John Michaelson](#)  
**Cc:** [Perry Friedman](#); [Donna Simmons](#)  
**Subject:** Fw: Teri Butler Calls with June  
**Date:** Monday, April 4, 2022 8:54:40 PM  
**Attachments:** [image003.png](#)

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Please let them know this works great. Also ask her what she'd like done regarding communicating other important information to Teri such as a potential illness or something of that sort and also what should we be doing to arrange visits for my mom with Teri.

Please thank her for sorting it out.

Thanks,

Robyn

---

**From:** Maria Parra-Sandoval <MParra@lacs.org>  
**Sent:** Monday, April 4, 2022 5:57 PM  
**To:** Robyn Friedman <vgfun@hotmail.com>  
**Cc:** John Michaelson <john@Michaelsonlaw.com>; Elizabeth Mikesell <EMikesell@lacs.org>  
**Subject:** Teri Butler Calls with June

Dear Robyn,

I have been in touch with Teri Butler in order to help facilitate calls from Teri to June.

Teri would like to call June on Mondays, Wednesdays and Fridays at 10:00 a.m. Teri will initiate the calls; she just needs a caregiver to help June accept the calls/pick-up the phone. Teri understands that June needs assistance accepting the calls. Teri understands that caregiver might be you. Teri will begin calling this week starting this Wednesday.

Thanks,

Maria

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Maria Parra-Sandoval, Esq.  
Attorney, Consumer Rights Project  
Legal Aid Center of Southern Nevada, Inc.  
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Las Vegas, NV 89104  
702-386-1526 direct/fax  
702-386-1070 ext. 1526

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

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

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

**From:** [Jack Butler](#)  
**To:** [John Michaelson](#); [mparra@lacsns.org](mailto:mparra@lacsns.org)  
**Subject:** June Jones full access  
**Date:** Thursday, March 31, 2022 1:45:05 PM

---

This email is to advise you based on your last communication with Terry Butler. It states your client Rob and Freidman wants you to have full access with Kathleen June Jones in whatever way works best for you?? Obviously your client has no idea what full access means, as you should know Teri is a school bus driver and has limited availability to take or make phone calls to her mom. For approximately five days in a row Teri attempted to call her mom during her midday break with no answer whatsoever and no voicemail set up to leave a message?

The last time she was able to converse with her mother Robyn was in the room as her mom stated. Please understand all Teri wants is the ability to call her mom when she is available not on a schedule but the same restrictions that Robyn asked for when she was not the guardian. In case you don't remember it is Monday through Sunday 8 to 8 without restriction surveillance or people listening in! If this is too hard for her to understand possibly she needs to remember what she required.

In addition you have been advised by Teri more than once to not involve her daughter Jen in any type of a three-way conversation with her mom. There will not be any visiting in California or any three-way phone calls excepted by Teri!

Jack and Teri Butler

Area code 714-920-3398

**From:** Teri Butler  
**To:** John Michaelson  
**Subject:** Re: visitation with Kathleen June Jones  
**Date:** Saturday, February 26, 2022 2:28:45 PM

---

I do think you and Robyn are trying to put me on a schedule, so I can talk to my mom! Robyn wants to record my conversation with my mom and use it against me in court, like she is doing to Kim. I work as you and Robyn know. I drive a school bus, and there is a shortage of school bus drivers. I can't get time off with a 14-hour notice, the one and only time Robyn invited me to see my mom, to have dinner in Newport beach California at 6pm on a Friday! It's a 6-to-8-hour drive. If Robyn wanted me to come to see my mom, she would have given me more notice. When I see my mom, it will be with other people around so I can have witnesses to what was said. I don't trust Robyn; she has shown on many occasions. For example, she put my personal information on a flash drives, then sent it out to people in my family, who will and can use it to get money and doesn't care who it affects. I will not put myself in that situation ever again!

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Teri Butler  
02/26/2022

On Fri, Feb 25, 2022 at 10:23 AM Teri Butler <[terijbutler@gmail.com](mailto:terijbutler@gmail.com)> wrote:

----- Forwarded message -----

**From:** **John Michaelson** <[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)>  
**Date:** Fri, Feb 25, 2022 at 9:27 AM  
**Subject:** RE: visitation with Kathleen June Jones

To: Teri Butler <[terijbutler@gmail.com](mailto:terijbutler@gmail.com)>  
CC: Ammon Francom <[Ammon@michaelsonlaw.com](mailto:Ammon@michaelsonlaw.com)>, Heather Ranck  
<[heather@michaelsonlaw.com](mailto:heather@michaelsonlaw.com)>

Teri,

We believe you have misunderstood the intent of us reaching out. We are not trying to put you on any restricted schedule for speaking with your mother. But for it to work, you need to help us find specific times that work best for you. Calling June at random times may result in her not being able to answer.

In reality we are reaching out because Jack repeatedly has said in court that you feel you will never see June again. We are reaching out to you to encourage you to understand that we want to make sure you DO see June and ideally sometime soon, as we know June would want to see you.

When would you like to actually see June? In other words, we are trying to plan a time for June to see you, in a time and place that works for you. When would that be? Or, are you saying for now phone calls would be better? We want to make sure calls are not missed so if we could setup a time for that Robyn will make sure June is available and ready for a private conversation with you. June cannot coordinate this on her own.

Again, with respect, you did not answer the questions in our email to you below.

Robyn wants to do whatever it takes, that is realistic and within reason, to ensure you have good access to your mother.

Thanks,

John P. Michaelson, Esq. | Michaelson Law | [john@michaelsonlaw.com](mailto:john@michaelsonlaw.com) | [702.731.2333](tel:702.731.2333)

**From:** Teri Butler <[terijbutler@gmail.com](mailto:terijbutler@gmail.com)>  
**Sent:** Saturday, February 19, 2022 1:36 PM

**To:** John Michaelson <john@Michaelsonlaw.com>  
**Cc:** Ammon Francom <Ammon@Michaelsonlaw.com>; Heather Ranck  
<heather@Michaelsonlaw.com>  
**Subject:** Re: visitation with Kathleen June Jones

John Michaelson

Tell Robyn Friedman that I want what the court awarded previously, when Kim Jones was taking care

of June Jones. Reasonable communications with June Jones (my Mother). 8 am to 8 pm.  
From Monday

through Sunday. I am sure you know the court order and what it says, better than I since Robyn was the one who asked for it.

Her cell phone or apple watch is supposed to be turned on, so if I want to talk to my mom, I can call her during those hours. I work

as a school bus driver so the only time I can call mom is from 9 am to 11 am and then again from 5 pm to 7 pm Monday through Friday,

and all day Saturday and Sunday. So far I have called my mom's phone for the last weeks and have got her voicemail.

It was not till the day I received this email that I got a call back from my mom , that lasted less than a minute, Which tells me your client is not

allowing me reasonable communications with June Jones. I called today Sat Feb 19 at 10 am and it went straight to voicemail

and her mailbox was full. Which also means all the voicemails of people calling my mom are not being returned.

This is a formal request for the paper that has my social security number on it and the picture of me in a tutu. Both which Robyn

copied on to flash drives sent to people in my family, that will or could be used against me. My mom told me she would destroy

all copies of that picture,for personal reasons no one in my family needs to know but me and my mom. But if I have to tell the court,

Robyn would not like it. So please tell her to return the picture and my social security number and any and all copies of them .

This is the Third time I have asked, Robyn has told me NO two times before. How can Robyn be responsible for my mom

personal information when she has sent out flash drives with My social security number, Donna's social security number and

Scott's birth certificate. Even if her assistants copied and sent them out , Robyn paid them and is ultimately responsible.

Since you sent me the stop and desist letter, about the box of pictures, which I did return . My personal information does not belong to my

family. I want them back. Before I seek other means of getting those back, or telling the court what other things Robyn has done. Like yelling

at my mom and tell her she can't make any decisions, the court gave me that right! I heard her say while on the phone,

You obviously know if the situation were reversed she would have me in court before the day was over!

I want nothing more to do with Robyn. until she returns my information and the flash drives! Only her assurance that I can call my mom as needed during the proposed times.

Teri Butler

On Wed, Feb 16, 2022 at 10:10 AM John Michaelson <[john@michaelsonlaw.com](mailto:john@michaelsonlaw.com)> wrote:

| Mrs. Teri Butler,



Our client, Robyn Friedman, wants you to have full access with Kathleen June Jones in whatever way works best for you.

If you do not want to work through Robyn directly to schedule, please let your daughter, Jen, schedule times for you to speak with/visit June. There are several options Robyn wants us to communicate to you:

1. Three-way conference calls with you, Jen and June.
2. Jen schedules a time for you to call June and Robyn will help make sure someone helps June answers your call.
3. Robyn will fly June to you, and arrange for you to pick her up curbside at the airport.
4. Robyn will have June dropped off in Las Vegas to wherever you may want to stay here. Robyn can have other people do the drop-offs.

Please let us know how you would like to communicate with June, whether it be the options above or another way. We will forward your response to Robyn.

Best Regards,

John P. Michaelson, Esq.

MICHAELSON LAW

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

[www.michaelsonlaw.com](http://www.michaelsonlaw.com)

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**Henderson**

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\*Please send correspondence to Henderson address

**Downtown Summerlin**

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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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Sent from Gmail Mobile

**From:** Teri Butler  
**To:** John Michaelson  
**Cc:** Ammon Francom; Heather Ranck  
**Subject:** Re: visitation with Kathleen June Jones  
**Date:** Saturday, February 19, 2022 1:35:57 PM

---

John Michaelson

Tell Robyn Friedman that I want what the court awarded previously, when Kim Jones was taking care of June Jones. Reasonable communications with June Jones (my Mother). 8 am to 8 pm. From Monday through Sunday. I am sure you know the court order and what it says, better than I since Robyn was the one who asked for it. Her cell phone or apple watch is supposed to be turned on, so if I want to talk to my mom, I can call her during those hours. I work as a school bus driver so the only time I can call mom is from 9 am to 11 am and then again from 5 pm to 7 pm Monday through Friday, and all day Saturday and Sunday. So far I have called my mom's phone for the last weeks and have got her voicemail. It was not till the day I received this email that I got a call back from my mom, that lasted less than a minute, Which tells me your client is not allowing me reasonable communications with June Jones. I called today Sat Feb 19 at 10 am and it went straight to voicemail and her mailbox was full. Which also means all the voicemails of people calling my mom are not being returned.

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Best Regards,

John P. Michaelson, Esq.

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# Exhibit 5

June 28, 2022

Elizabeth Mikesell, Esq.  
Legal Aid of Southern Nevada  
725 E. Charleston Blvd  
Las Vegas, NV 89104

Re: G-19-052263-A  
In the Matter Guardianship of the Person and Estate of Kathleen June Jones; and  
Teri Butler

Dear Ms. Mikesell,

Although we have reached out to your office before, we wanted you to be aware again of the ongoing problem we are having with Teri Butler, daughter of the Protected Person, Ms. Jones, regarding arranging visits and general communication complaints, which are becoming costly to Ms. Jones' estate. Teri refuses to communicate directly with the Guardian, Robyn Friedman. June has access to her phone and every family member can call her number at any time. However, as you are aware, Ms. Jones is incapable of communicating with anyone without assistance, let alone coordinating a calendar, communication or visitation, and so needs assistance from the Guardian to communicate with Teri. While Teri continues to assert that June can answer her phone, this belief is not rooted in the reality that June rarely manages to successfully answer the phone before the call goes to voicemail. Also, even if June were to be able to answer her phone, June has no ability to protect herself from scammers who call her phone regularly, and Teri ignores the ongoing concern that Dean was using June's phone for his own potentially fraudulent or illegal purposes, as has been discussed in this case. June does not have the cognitive capacity to not give out her personal information to anyone who asks even if she were to be able to answer her phone on without assistance.

Robyn will happily assist Ms. Jones to communicate with Teri but needs to know in advance when to assist Ms. Jones as there is not someone sitting next to June or able to run a ringing phone to June at any given time throughout the day. Since Teri refuses to communicate with Robyn, LACSN apparently intervened with Teri and a time schedule was set up according to Teri's wishes. Robyn has arranged for June to call Teri according to that set schedule of phone calls, chosen by Teri with LACSN's assistance, barring June being asleep or otherwise occupied, which does happen occasionally. At Teri's direction, Robyn has no way to alert Teri if this will be the case ahead of time and June cannot make the call. Originally Teri was to be the one placing these calls to June. Teri quickly stopped placing the calls and Robyn has attempted to make calls around those same times/days (and more) for June. Robyn is more than willing to facilitate more communication between Teri and June, if the current level or situation is not acceptable or satisfying. However, she cannot do so without communication with Teri. Teri has threatened to involve police and courts if Robyn attempts to communicate with Teri, even indirectly through other family members.

Despite Teri's prohibition on communication with her, she and/or her husband do very occasionally and randomly email us as Robyn's counsel. The emails are rife with misrepresentations and unhelpful statements. So, recently, we took the calculated risk of responding to Teri via email that Robyn does not want our firm to be a communication channel for Teri and requested Teri to contact Robyn directly to discuss or complain about visitation or communication issues, in order to reduce fees from the estate.

Again, we have received various emails with all manner of allegations from Teri. We want to provide you with copies of the communications, so you have the information. They are attached to our email to you along with this letter. Teri's allegations contained therein are generally false or grossly exaggerated. June is available to receive or accept calls at any time, and sometimes that works out if someone is sitting with June when the phone rings unexpectedly, but there will not be someone waiting to answer June's phone randomly throughout the day – as Teri continually asserts. It is just not feasible or a reasonable expectation of any guardian. To be clear, anyone is free to call June at any time; there are no time restrictions on when they can call her. However, if June is unable to answer the phone at that time, for a myriad of reasons, a return call will be made. Teri is unique in that she adamantly refuses Guardian's help to make the return call and expects June to answer her call each and every time, regardless of if June is sleeping, eating, or otherwise engaged.

Furthermore, Teri mistakenly claims that Robyn previously expected June to be available from 8am-8pm for phone calls from Robyn before Robyn became guardian. This couldn't be further from the truth as Robyn vigorously attempted to have a reliable time/day to contact and speak with June because Robyn is not in denial and has for years understood and respected June's lack of cognitive ability to answer the phone safely or consistently on her own. Previously Robyn sent a link to set up Talking Parents for Teri to which Teri also has not responded. It was sent via email.

June would very much like to actually visit with Teri and, as the Guardian, Robyn would like to be able to update Teri with important and even trivial information regarding June. Talking Parents is an easy way to do this but requires Teri's participation. Again, Teri has threatened to call the police for harassment if Robyn attempts to contact Teri, so my client is currently at a loss as to what to do to ensure June can successfully visit with her other daughter Teri in person, as they were able to do frequently in the past when Teri regularly came out to Las Vegas (even staying in hotels or her trailer at times) or having June visit Teri in Flagstaff. In phone calls, when they do happen, Teri is intentionally leading June on and telling her that she can come visit and June tells her that she will come out in a month (per June's retelling). If this is the case this is a cruel cycle of abuse to inflict upon a person with cognitive issues as it builds up anticipation and hope that is just dashed again and again because Teri absolutely refuses any attempts to coordinate by Robyn to actually make these visits with Teri a reality. It's heartbreaking for June and Robyn and frankly the rest of the family. Either Teri needs to actually, successfully schedule these visits with Robyn to make them happen, or she needs to quit lying to June when June asks about visits and falsely raising her hopes.

If Teri and Jack are going to insist, as they do in some of the emails to our office, that visits will not be occurring at all, we will respect that and let June know to the best of the Guardian's ability to communicate that rejection and unwillingness to work things out so June can see her daughter. We are asking LACSN, unless and until they are removed or withdraw, on behalf of the protected



person, to advocate for June in this matter regarding that development (per Teri's emails) or lack of progress in attempts to resolve the issue. The Guardian does not approve of or condone June not being able to see Teri regularly, as June has repeatedly expressed her wishes to visit Teri. Additionally, the Guardian wants all concerns Teri has regarding access to speak to her mom resolved so that Teri doesn't feel as if she can't communicate with June, because the Guardian firmly believes it is in June's best interest to talk to Teri regularly as she looks forward to the calls.

Per June's request, she would also like to speak with Kim and see her. The Guardian is asking that LACSN support the protected person in this regard while recognizing that the Guardian does not feel this is something that can be done safely, without supervision, at the current time due to Kim's insistence on constantly filming against June's expressed previous wishes and the wishes of the people who would need to deliver June to Kim and pick her up. Additionally, Kim insists on bringing her boyfriend around, whom the Guardian believes has taken advantage of June in numerous ways including attempting to sell June's property without court approval (jet ski and art sculptures at a minimum - please see attached), using June's phone for personal communication with known felons and others, and unduly profiting at the expense of the protected person by living in her home rent free (see mail addressed to Dean Loggans from a hospital to June's Anaheim address) and accepting tens of thousands of dollars for home renovation services that weren't professionally provided, even causing additional damage financially to June. The pattern of personal gain and harm to June has to stop. Please assist June in whatever way you can to advocate for her so she can see and communicate with Kim in a safe manner for June. Please also respect June's actual cognitive function and help create a plan grounded in reality.

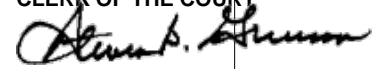
Robyn will continue to assist June in communicating with her family members. Any family member who wants to be in contact with June merely needs to contact June (and leave a message if she is unable to answer) or Robyn and Robyn will assist June to communicate by returning phone calls, initiating scheduled phone calls and helping June to answer the phone or FaceTime, as needed. Robyn will ensure June will have privacy for the conversations.

Sincerely,



John Michaelson, Esq.

Encl.



1 **OBJ**

2 Elizabeth Mikesell, Esq.  
3 Nevada Bar No. 08034

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

6 725 E. Charleston Blvd.

7 Las Vegas, NV 89104

8 Telephone: (702) 386-1533

9 Facsimile: (702) 386-1533

10 [emikesell@lacsnc.org](mailto:emikesell@lacsnc.org)

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

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

17 In the Matter of Guardianship of the Estate of:

**Case No. G-19-052263-A**

**Dept. No. B**

18 KATHLEEN JUNE JONES,  
19 Adult Protected Person.

20  
21 **PARTIAL OBJECTION TO PETITION TO REMOVE LEGAL AID CENTER OF**  
22 **SOUTHERN NEVADA; OR, IN THE ALTERNATIVE, TO LIMIT THE SCOPE OF**  
23 **COURT APPOINTED COUNSEL; PETITION TO REAPPOINT THE GUARDIAN**  
24 **AD LITEM; PETITION FOR INSTRUCTIONS CONCERNING USING FUNDS TO**  
25 **PAY FOR LEGAL SERVICES**

26 Kathleen June Jones ("June"), the protected person herein, by and through her counsel,  
27 Elizabeth Mikesell, Esq., hereby files this Partial Objection to Petition to Remove Legal Aid  
28 Center of Southern Nevada; or, in the Alternative, to Limit the Scope of Court Appointed  
Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for Instructions Concerning  
Using Funds to Pay for Legal Services. June's partial objection is based upon and supported by  
the following Memorandum of Points and Authorities, the pleadings and papers on file in this  
case, and the argument of counsel as allowed by the Court at the time of hearing.

///

///

///

///

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. BACKGROUND**

3 The Petition's background facts are almost entirely comprised of finger-pointing at  
4 Legal Aid Center, and only pay minimal lip service to June's expressed wishes. Importantly,  
5 the Petition also lacks any legal authority to support its request to remove or restrict Legal Aid  
6 Center in its representation of June. Because Legal Aid Center has a duty of confidentiality to  
7 June, this partial objection will not divulge details regarding Legal Aid Center's  
8 communications and visits with June. Instead, this partial objection will briefly discuss facts  
9 relevant to Legal Aid Center's representation of June throughout the proceedings.  
10

11  
12 Robyn and Donna initiated this case back on September 19, 2019, when they filed for  
13 guardianship ex parte over June. That petition was granted on September 23, 2019, and then  
14 Legal Aid Center was later appointed as counsel for June on September 25, 2019. Following  
15 Legal Aid Center's appointment, it was discovered that June executed various estate planning  
16 documents well before the guardianship proceedings began, which included a Healthcare Power  
17 of Attorney, a Financial Power of Attorney, and a Last Will and Testament. Both Powers of  
18 Attorney named Kimberly Jones as June's Attorney-in-Fact, and June's Last Will and  
19 Testament named Kimberly Jones as June's Personal Representative and elected her as guardian  
20 if the need ever arose. No one in the case has questioned June's capacity when she executed  
21 those documents.<sup>1</sup>  
22

23  
24 From the beginning of Legal Aid Center's appointment in the case, June has confirmed  
25 her wishes, already expressed in her estate planning documents, that Kimberly serve as  
26

---

27 <sup>1</sup> Even if this Court agrees with Robyn and Donna's contentions regarding June's current  
28 capacity to direct legal affairs, LACSN would still have a duty, under Statewide Rules of  
Guardianship Rule 9(E)(1), to zealously advocate for June's wishes expressed in her estate  
planning documents.

1 guardian. After this Court was informed that June wanted Kimberly to make medical and  
2 financial decisions for her if the need ever arose, Kimberly was subsequently appointed as  
3 guardian on November 25, 2019. Following Kimberly's appointment, Legal Aid Center has  
4 communicated with June throughout each stage of the proceedings to confirm her wishes. And  
5 Legal Aid Center has consistently complied with its duty under Statewide Rules of  
6 Guardianship Rule 9 to advocate for June's expressed wishes, even when those wishes might  
7 be against her "best interest."

## 9 II. DISCUSSION

### 10 A. Robyn and Donna do not provide any legal authority to support their request 11 to remove Legal Aid Center as counsel for June.

12 In what is supposed to be the "Law and Application" for the "Petition to Replace  
13 LACSN," Robyn and Donna only briefly rely on two pieces of supposed legal authority to  
14 support their request to remove Legal Aid Center. Instead, the 7-page discussion in the "Law  
15 and Application" section is simply the airing of their own personal grievances and complaints  
16 about Legal Aid Center's representation of June. Likely because there is no legal basis to  
17 support their request.

18 The first piece of supposed legal authority the Petition cites is NRS 159.0485, which  
19 provides the court with the authority to appoint counsel for proposed protected persons and  
20 protected persons. The Petition claims that the statute "even includes instructions for petition  
21 for a private attorney when the protected person has the means to pay for representation."  
22 *Petition*, at 11. However, this ignores the actual language in the statute regarding the protected  
23 person retaining a private attorney.

24 To this point, the statute states, in part, that "'[u]pon the filing of a petition for the  
25 appointment of a guardian for a proposed protected person, the court shall appoint an attorney  
26

1 for the proposed protected person **unless the proposed protected person wishes to retain or**  
2 **has already retained an attorney of his or her own choice.**” NRS 159.0485(1) (emphasis  
3 added). Then, it goes on to state that after the initial filing of the petition for appointment of  
4 guardian and after the court has appointed an attorney for the protected person, “**if it is**  
5 **ascertained that the proposed protected person wishes to have another attorney represent**  
6 **him or her,** the court shall appoint that attorney to represent the proposed protected person.”  
7 NRS 159.0485(2)(a) (emphasis added). Therefore, there is only one controlling factor that gives  
8 this Court the authority to remove the court-appointed attorney for the protected person in favor  
9 of a private attorney: when the protected person expresses a desire for a private attorney to be  
10 retained on their behalf. June has never expressed any such desire.

13 The second piece of supposed legal authority the Petition cites is NRPC 3.1, which is  
14 the Nevada Rule of Professional Conduct governing a lawyer’s duty to only pursue meritorious  
15 claims and contentions. This unscrupulous attack deserves little discussion. Here’s why. The  
16 Nevada Rules of Professional Conduct explicitly state that “[f]ailure to comply with an  
17 obligation or prohibition imposed by a Rule is a basis for invoking disciplinary process” NRPC  
18 1.0A. However, that same rule goes on to state that “violation of a Rule does not necessarily  
19 warrant any other nondisciplinary remedy, **such as disqualification of a lawyer in pending**  
20 **litigation.**” NRPC 1.0A(d) (emphasis added). That same subsection even warns that “the  
21 purpose of the Rules can be subverted when they are invoked by opposing parties as procedural  
22 weapons” and that the Rules do not “imply that an antagonist in a collateral proceeding or  
23 transaction has standing to seek enforcement of the Rule.” NRPC 1.0A(d). If Robyn and Donna  
24 truly believe June’s counsel has violated the Nevada Rules of Professional Conduct, then they  
25 are free to file a complaint with the State Bar of Nevada. However, they should not be allowed  
26 to weaponize the rules in this guardianship proceeding, which is exactly what NRPC 1.0A(d)  
27  
28

1 warns against. Therefore, the NRPC 3.1 does not provide them with a basis to seek  
2 disqualification of Legal Aid Center from June's guardianship case.

3 Robyn and Donna's request to remove Legal Aid Center relies solely on personal  
4 complaints and ad-hominem attacks against Legal Aid Center, rather than any actual legal  
5 authority. Therefore, this Court should deny their request outright because there is simply no  
6 legal basis for it.  
7

8 **B. Robyn and Donna do not provide any authority to limit the scope of Legal Aid**  
9 **Center's representation of June.**

10 The Petition alternatively requests that this Court revise its Order Appointing Legal Aid  
11 Center and limit the scope of its representation. Once again, the Petition fails to provide any  
12 relevant legal authority to support this alternative request. The Petition mainly relies on  
13 Statewide Rules for Guardianship Rule 9(I).  
14

15 First, it must be noted that nowhere in Rule 9 does it provide any party with the ability  
16 to request limitation of court-appointed counsel's scope of representation, nor does it provide  
17 any remedy for violation of Rule 9. Instead, Rule 9 simply outlines the scope of representation  
18 and is meant to guide the court-appointed counsel through their representation. So, even if this  
19 Court were convinced by the Petition's unfounded and unprofessional attacks, Rule 9 does not  
20 provide the remedy that the Petition seeks.  
21

22 With that said, Rule 9(I) does not even support the Petition's allegation that Legal Aid  
23 Center has violated the scope of its representation. Rule 9(I) provides that "[i]f the protected  
24 person or proposed protected person is unable to express or communicate his or her wishes to  
25 the attorney or maintain, as far as reasonably possible, a normal client-attorney relationship, the  
26 attorney shall protect the legal interests and due process rights of the protected person or  
27 proposed protected person and the attorney may take reasonably necessary protective action  
28

1 pursuant to Rule 1.14 of the Rule of Professional Conduct, which may include requesting the  
2 appointment of a guardian ad litem under NRS 159.0455 to advocate for the best interest of the  
3 protected person or proposed protected person.” Therefore, under Rule 9(I) court-appointed  
4 counsel is mandated to protect June’s legal interests and due process rights, which is precisely  
5 what court-appointed counsel has done both in this case and in separate appeals. Moreover,  
6 while Robyn and Donna might prefer that a guardian ad litem, paid for from June’s estate, serve  
7 indefinitely in this case, Rule 9(I) does not place any requirement on court-appointed counsel  
8 to advocate for the appointment of a guardian ad litem, it simply states that court-appointed  
9 counsel “may” do so. Under the Petition’s analysis, court-appointed counsel in guardianship  
10 matters should simply stand idly by and not advocate for their client’s expressed wishes when  
11 the protected person is of diminished capacity, which as this Court is aware, would be almost  
12 every guardianship case before it. Moreover, the Petition fails to even acknowledge the rest of  
13 Rule 9, likely because it completely undermines their argument.

14  
15  
16 For instance, Rule 9(C) requires that court-appointed counsel maintain a normal client-  
17 attorney relationship “as far as reasonably possible,” and that court-appointed counsel advocate  
18 for the protected person’s expressed wishes “even if those expressed wishes are in conflict with  
19 the client’s apparent best interests.” Also, under Rule 9(E)(1) court-appointed counsel has a  
20 duty to “[z]ealously advocate for the expressed wishes of the protected person or proposed  
21 protected person, including those wishes contained in any advance directive or estate-planning  
22 document.” Moreover, under Rule 9(E)(10) court-appointed counsel has a duty to file  
23 “appropriate petitions, motions, briefs, and appeals on behalf of the protected person or  
24 proposed protected person.” And Rule 9(E)(13) places a duty on court-appointed counsel to  
25 ensure “proper due process procedure is followed and relevant statutes are complied with.”  
26  
27  
28

1 Therefore, Rule 9 commands that court-appointed counsel advocate as Legal Aid Center  
2 has done in June's case. Once learning of June's prior estate planning documents stating that  
3 she prefers Kimberly making medical and financial decisions for her, Legal Aid Center then  
4 had a duty to advocate for those expressed wishes. Throughout the proceedings, June continued  
5 to express those same wishes. Moreover, Legal Aid Center has a duty to protect June's due  
6 process rights and ensure that relevant statutes are complied with, which includes filing  
7 appropriate motions, objections, and appeals when necessary.  
8

9 **C. This Court should deny the Petition's request that visits between Legal Aid**  
10 **Center staff and June be supervised.**

11 It should go without saying, but the Petition's request for supervised visits between  
12 Legal Aid Center staff and June is an attempt by Robyn and Donna to insert themselves squarely  
13 into the attorney-client relationship between June and her counsel. Granting this request would  
14 completely undermine confidentiality and restrict court-appointed counsel's ability to advocate  
15 for June. It would also completely contradict this Court's September 25, 2019 Order Appointing  
16 Counsel and Directing Release of Medical and Financial Records and Information, which  
17 specifically states that Legal Aid Center "and each of its attorneys and employees, shall have  
18 access to and be permitted to speak confidentially with Kathleen J. Jones at any public or private  
19 institution, facility, or residence." This Court has never altered or amended that order. Yet,  
20 without any court approval, Robyn and Donna have taken it upon themselves to violate that  
21 order by advising of their intention to restrict the Legal Aid Center's ability to meet with June  
22 privately and confidentially.<sup>2</sup> This has already prevented Legal Aid Center from privately  
23  
24  
25

---

26 <sup>2</sup> On July 9, 2022, counsel for Robyn and Donna advised Legal Aid Center Counsel that the  
27 "Guardian intends to no longer have the protected person meet privately" with Legal Aid Center  
28 staff. See Letter from John Michaelson, dated July 09, 2022, attached hereto as **Exhibit 1**;  
emails from John Michaelson, attached hereto as **Exhibit 2**. Mr. Michaelson appears to take  
issue with Kimberly being present in the past during meetings between June and Legal Aid  
Center staff. However, there is a very obvious difference between June giving Legal Aid Center



1 discussing the Petition and the Petition for Authority to Sell the Protected Person's Real  
2 Property with June.

3 **D. This Court should deny Robyn and Donna's request to appoint the guardian**  
4 **ad litem indefinitely.**

5 There is no issue presently before this Court that requires the assistance of a guardian  
6 ad litem. Robyn and Donna only seek the appointment of a guardian ad litem to further  
7 undermine the attorney-client relationship between June and Legal Aid Center, and to create  
8 another obstacle for June in advocating for her expressed wishes. To make matters worse,  
9 Robyn and Donna are asking that June's estate once again pay for the guardian ad litem, in  
10 addition to also requesting that her estate pay for a private attorney. This Court should deny this  
11 request also at this time.  
12

13  
14 DATED this 15<sup>th</sup> day of August, 2022.

15  
16 **LEGAL AID CENTER OF**  
17 **SOUTHERN NEVADA, INC.**

18 /s/ Elizabeth Mikesell, Esq.

19 Elizabeth Mikesell, Esq.

20 Nevada Bar No. 08034

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

23 725 E. Charleston Blvd

24 Las Vegas, NV 89104

25 Telephone: (702) 386-1533

26 Facsimile: (702) 386-1533

27 [emikesell@lacsnc.org](mailto:emikesell@lacsnc.org)

28 *Attorney for Adult Protected Person Kathleen*  
*June Jones*

\_\_\_\_\_  
staff permission to discuss the case in the guardian's presence, and the guardian demanding that  
they be present during every meeting.

1  
2 **CERTIFICATE OF SERVICE**  
3

4 I HEREBY CERTIFY that on the 15<sup>th</sup> day of August, 2022, I deposited in the United  
5 States Mail at Las Vegas, Nevada, a copy of the foregoing document entitled **PARTIAL**  
6 **OBJECTION TO PETITION TO REMOVE LEGAL AID CENTER OF SOUTHERN**  
7 **NEVADA; OR, IN THE ALTERNATIVE, TO LIMIT THE SCOPE OF COURT**  
8 **APPOINTED COUNSEL; PETITION TO REAPPOINT THE GUARDIAN AD LITEM;**  
9 **PETITION FOR INSTRUCTIONS CONCERNING USING FUNDS TO PAY FOR**  
10 **LEGAL SERVICES** in a sealed envelope, mailed regular U.S. mail, upon which first class  
11 postage was fully prepaid, addressed to the following:  
12

13 Teri Butler  
14 586 N Magdalena St.  
15 Dewey, AZ 86327

Jen Adamo  
14 Edgewater Dr.  
Magnolia, DE 19962

16 Scott Simmons  
17 1054 S. Verde Street  
18 Anaheim, CA 92805

Jon Criss  
804 Harkness Lane, Unit 3  
Redondo Beach, CA 90278

18 Ryan O'Neal  
19 112 Malvern Avenue, Apt. E  
20 Fullerton, CA 92832

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

21 Ampersand Man  
22 2824 High Sail Court  
Las Vegas, NV 89117

Courtney Simmons  
765 Kimbark Avenue  
San Bernardino, CA 92407

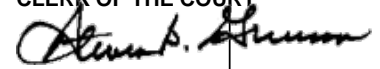
23  
24 AND I FURTHER CERTIFY that on the same date I electronically served the same  
25 document to the following via ODYSSEY, the Court's electronic filing system, pursuant to  
26 EDCR 9:  
27

28 ///

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John P. Michaelson	<a href="mailto:john@michaelsonlaw.com">john@michaelsonlaw.com</a>
Kelly L. Easton	<a href="mailto:kellye@sylvesterpolednak.com">kellye@sylvesterpolednak.com</a>
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Robyn Friedman	<a href="mailto:vgfun@hotmail.com">vgfun@hotmail.com</a>
Peter Pratt	<a href="mailto:peter@michaelsonlaw.com">peter@michaelsonlaw.com</a>
Heather Ranck	<a href="mailto:heather@michaelsonlaw.com">heather@michaelsonlaw.com</a>
Jeffrey Sylvester	<a href="mailto:jeff@sylvesterpolednak.com">jeff@sylvesterpolednak.com</a>
Elizabeth Brickfield	<a href="mailto:ebrickfield@dlnevadalaw.com">ebrickfield@dlnevadalaw.com</a>
Lauren Candela	<a href="mailto:lcandela@dlnevadalaw.com">lcandela@dlnevadalaw.com</a>
Melissa R. Romano	<a href="mailto:mromano@dlnevadalaw.com">mromano@dlnevadalaw.com</a>
Donna Simmons	<a href="mailto:donnamsimmons@hotmail.com">donnamsimmons@hotmail.com</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>
Kate McCloskey	<a href="mailto:NVGCO@nvcourts.nv.gov">NVGCO@nvcourts.nv.gov</a>
Ty Kehoe	<a href="mailto:tykehoelaw@gmail.com">tykehoelaw@gmail.com</a>

/s/ Jennifer Bocek-Dobijanski  
Employee of Legal Aid Center of Southern Nevada, Inc.



**RPLY**

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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.	)	
	)	

**REPLY TO PARTIAL OBJECTION TO PETITION TO REMOVE LEGAL AID  
CENTER OF SOUTHERN NEVADA; OR IN THE ALTERNATIVE, TO LIMIT THE  
SCOPE OF COURT APPOINTED COUNSEL; PETITION TO REAPPOINT THE  
GURARDIAN AD LITEM; PETITION FOR INSTRUCTIONS CONCERNING USING  
FUNDS TO PAY FOR LEGAL SERVICES**

COMES NOW Robyn Friedman, Successor Guardian ("Robyn") of the Person and Estate of Kathleen June Jones, by and through Michaelson Law, and files this *Reply to Partial Objection to Petition to Remove Legal Aid Center of Southern Nevada; Or, In the Alternative, to Limit the Scope of Court Appointed Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for Instructions Concerning Using Funds to Pay for Legal Services*. Specifically, Petitioner replies to LACSN's allegations that this Court has no authority to remove LACSN and that there is no

1 need for the appointment of a Guardian ad Litem. LACSN's inappropriate actions in this case  
2 have hurt the Protected Person and her Estate, violated the Protected Person's Bill of Rights,  
3 caused unnecessary litigation and appeals, and imposed a great financial burden on the Guardian  
4 and ultimately on the Protected Person's Estate.

### 5 **BACKGROUND**

6 1. On July 28, 2022, Robyn filed the Petition to Remove Legal Aid Center of Southern  
7 Nevada; Or, In the Alternative, to Limit the Scope of Court-Appointed Counsel; Petition to  
8 Reappoint the Guardian Ad Litem; Petition for Advice and Instructions Concerning Using Funds  
9 to Pay for Legal Service (the "Petition").

10 2. On August 15, 2022, Legal Aid Center of Southern Nevada filed a Partial Objection to  
11 Petition to Remove Legal Aid Center of Southern Nevada; Or, In the Alternative, to Limit the  
12 Scope of Court-Appointed Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for  
13 Advice and Instructions Concerning Using Funds to Pay for Legal Service.

### 14 **ARGUMENT**

#### 15 **I. Guardian stands by her position that LACSN should be removed and that** 16 **this Court has authority to do so.**

##### 17 **a. LACSN Should be Removed And Replaced**

18 3. This Court has authority to remove the Legal Aid Center of Southern Nevada law firm  
19 ("the LACSN law firm" or "Legal Aid" or "LACSN") and it should remove and replace the  
20 LACSN as counsel for the Protected Person, Kathleen June Jones ("June" or the "Protected  
21 Person").

22 4. LACSN has shown throughout the almost three years of this case that is unable and  
23 unwilling to abide by the requirements of NRS 159, the Statewide Rules of Guardianship, and  
24 Nevada Rules of Civil Procedure ("NRPC") 1.14 in this matter. LACSN's (i) willful disregard for  
25

1 all of the medical and other evidence presented in this case along with this Court's explicit Findings  
2 of Facts and Conclusions of Law on many points including the protected person's lack of capacity  
3 to direct handle her own affairs or direct legal counsel, as well as its (ii) refusal to limit itself to  
4 protecting only June's due process rights, and its (iii) objection to appointment of a Guardian ad  
5 Litem to advocate for June's best interests, as detailed in the Petition, are ample justification for  
6 the removal and replacement of LACSN from this case.

7 5. As set forth in the Petition, the LACSN law firm has continuously alleged that June is  
8 directing the LACSN law firm in its numerous appeals and litigation, in spite of all the medical  
9 evidence before this Court, in spite of the previous Findings of Fact and Conclusions of Law from  
10 this Court stating that June lacks capacity, in spite of the Guardian ad Litem report that June lacks  
11 this type of capacity, and in spite of the LACSN's own assertions from the very beginning of the  
12 case almost three years ago that June did not understand that the Kraft Avenue home had been  
13 transferred from her for far less than market value and that she no longer owned the property, even  
14 when the LACSN attorney acknowledged that she had to inform her of those facts repeatedly. As  
15 this Court made clear in its Conclusion of Law in the Order filed June 29, 2022, "Court-appointed  
16 counsel's contentions that Ms. Jones is directing her legal affairs are unfounded—all the medical  
17 evidence establishes she cannot do so." *See* Exhibit 1, Findings of Fact, Conclusions of Law and  
18 Order Denying Motion to Stay Order Appointing Successor General Guardian of the Person and  
19 Estate and for Issuance of Letters of General Guardianship (hereinafter "**June 29th Order**"), pg  
20 20, lines 8-9.

22 6. As laid out in great detail in the Petition, LACSN has failed repeatedly to take into account  
23 June's actual capacity to direct legal affairs and has violated NRPC 1.14 and NRS 159 by  
24 substituting Legal Aid's own judgment so it can further its own agenda. LACSN appears stuck on  
25

1 the simple fact that long ago June nominated another one of her daughters, Kimberly Jones  
2 (hereinafter “Kim” or “Kimberly”) as guardian. Legal explicitly noted that it believes it still, three  
3 years after this case began, has a “duty, under Statewide Rules of Guardianship Rule 9(E)(1), to  
4 zealously advocate for June’s wishes expressed in her estate planning documents”. *See* Partial  
5 Objection, pg 2, footnote 1. Obviously, a nomination from many years ago is not inviolate! It  
6 does not mean that nothing will ever change, especially in light of this Court’s other findings and  
7 conclusions regarding Kimberly’s ongoing misconduct while acting as guardian, even while being  
8 represented by her own counsel and being admonished by the Court to get her act together. Even  
9 at the initial stages of a proposed guardianship, a nomination is not inviolate, as a proposed  
10 guardian must be properly vetted by the Court. Under the interpretation of its duty as expressed  
11 in its Partial Objection, LACSN would be claiming a duty to zealously advocate for any person  
12 nominated in estate planning documents, no matter how unsuitable, even after having actual  
13 knowledge that the nominated person is unsuitable, in complete opposition to its duty of protecting  
14 the proposed protected person or protected person, especially under the Protected Person’s Bill of  
15 Rights.  
16

17 **b. This Court Has Authority to Remove LACSN**

18 7. Rule 9(D)(5) of the Nevada Statewide Rules for Guardianship empowers this Court to  
19 remove an attorney for a protected person. Rule 9(D)(5) establishes “[a]n attorney for the  
20 protected person or proposed protected person shall in all cases: . . . 5. Continue as the attorney  
21 for the protected person or proposed protected person *unless and until relieved as counsel by*  
22 *order of the guardianship court.*” Likewise, NRS 159.0485(2)(A) states the attorney appointed  
23 from a county legal services program, such as LACSN, “shall represent the proposed protected  
24  
25

1 person until relieved of the duty by court order.” This Court has authority to remove the LACSN  
2 law firm pursuant to statute and rules.

3 8. The September 25, 2019 Order Appointing Counsel and Directing Release of Medical And  
4 Financial Records and Information, written by LACSN and attached hereto as Exhibit 2, authorizes  
5 the removal of Legal Aid by this Court:

6 IT IS FURTHER ORDERED that the appointment of LEGAL AID CENTER OF  
7 SOUTHERN NEVADA, INC. as counsel for KATHLEEN J. JONES shall terminate when  
8 so ordered by this Court or upon this case being otherwise closed or dismissed or the  
guardianship terminated, at which time LEGAL AID CENTER OF SOUTHERN  
NEVADA, INC shall be relieved of its duties as appointed counsel. Pg 3, lines 5-9.

9 It is very disingenuous for the LACSN law firm to claim that this Court lacks authority to remove  
10 LACSN from this matter when the very Order appointing Legal Aid also sets forth the basis for  
11 the ending of its appointment. LACSN’s authority in this matter is solely limited to that which is  
12 given it by this Court.

13 9. The June 29<sup>th</sup> Order included a Conclusion of Law that the LACSN law firm was engaging  
14 in its own interests and not June’s, *i.e.* “[t]he object of the appeal has little to do with the Protected  
15 Person and everything to do with a misguided attempt to change the guardianship statutes by  
16 establishing a pattern or expectation that once a legal aid attorney makes a representation of a  
17 protected person’s wishes, all further inquiry, even by the Court, must cease.” *See* Exhibit 1, pg  
18 18, lines 6-10.

19 10. Even after receiving the June 29<sup>th</sup> Order from the Court (an Order LACSN did not Appeal),  
20 Legal Aid failed to transform its representation of June to only protecting her due process rights,  
21 and continues to claim that it is guided by June and representing her wishes, notwithstanding the  
22 Findings and Conclusions of the June 29<sup>th</sup> Order that June “lacks capacity to direct her legal affairs.  
23 . . . Court-appointed counsel’s contentions that Ms. Jones is directing her legal affairs are  
24  
25



1 unfounded—all the medical evidence establishes she cannot handle doing so.” June 19<sup>th</sup> Order, pg.  
2 20, lines 4-10. LACSN, which knew of June’s cognitive limitations from the beginning of the  
3 case, should have limited its representation to protecting June’s due process rights, while seeking  
4 the appointing of a GAL to protect June’s best interests.

5 11. The LACSN law firm seems to be under the mistaken belief that NRPC 1.14 does not apply  
6 to it as court-appointed attorneys for protected persons in guardianship matters. Statewide Rule  
7 for Guardianship 9(I) explicitly references NRPC 1.14 for circumstances where an attorney for a  
8 protected person cannot “maintain, as far as reasonably possible, a normal client-attorney  
9 relationship,” and that is precisely the situation June is currently experiencing.

10 12. Nevada adopted the ABA Model Rule 1.14 without any alterations or modifications, which  
11 is broader than Rule 9 of the Statewide Rules for Guardianship. The comments to the Model Rule  
12 are relevant and significant, if not controlling, for Nevada. Comment [1] is on point here, and  
13 states in pertinent part:

14  
15 The normal client-lawyer relationship is based on the assumption that the client, when  
16 properly advised and assisted, is capable of making decisions about important matters. When the client is a minor or suffers from a diminished mental capacity, however,  
17 maintaining the ordinary client-lawyer relationship may not be possible in all respects. In particular, a severely incapacitated person may have no power to make legally binding decisions. *See* Exhibit 3, ABA Model Rule 1.14: Client with Diminished Capacity and  
18 Comment.

19 13. All the evidence shows that June has been severely limited from before this case began, so  
20 much so that she cannot ever recall or put into context that she lost her long-time Las Vegas home  
21 – the Kraft Avenue house - and could not understand that she no longer owned it, even when  
22 reminded again and again by her own counsel, as acknowledged by her LACSN attorney. June has  
23 “no power to make legally binding decisions,” as stated in Comment [1], and, as this Court  
24  
25

1 concluded, she “lacks capacity to direct her legal affairs . . . “ *See* Exhibit 1, June 19<sup>th</sup> Order, pg.  
2 20, lines 4-10.

3 14. Furthermore, as detailed in the Petition, multiple medical reports available to LACSN since  
4 the very beginning of this case – and brought to LACSN’s attention continuously for three years  
5 now - show June lacks the capacity to direct legal affairs. The GAL in her report also found that  
6 June lacked capacity to direct legal affairs and to understand the consequences of decisions and  
7 choices. *See* Exhibit 4, Report to the Court by Guardian Ad Litem filed March 29, 2021.  
8 Everything noted here has been established from the very beginning of this case, making LACSN’s  
9 woeful disregard for June’s capacity even more appalling.

10 15. Legal Aid’s continuing objection to the removal of Kim based on the fact that she was  
11 nominated in ancient estate planning documents, in-spite of her current real-life misconduct is  
12 tone-deaf to the reality of how much harm Kim did to her mother, her mother’s estate, and her  
13 mother’s family as guardian. LACSN’s opposition does not address any of these realities. It is  
14 one thing for LACSN to reiterate over and over again that it is client-directed and so they have to  
15 make the argument in support of a bad guardian even when it does not make sense and runs  
16 contrary to the protected person’s best interest, but it is quite another thing to file multiple appeals  
17 costing hundreds of thousands of dollars for multiple parties all in support of something that is  
18 clearly wrong and not directed by the protected person, as is the case at hand.

19 20 16. In addition to statutory and guardianship rules bases for removal authority, Nevada Courts  
21 have exercised inherent authority to remove attorneys in a variety of settings for various reasons.  
22 For example, the Nevada Supreme Court has upheld the removal of an attorney when an attorney  
23 may be called to testify in matter. In *Moore v. De Bernardi*, 220 P.2d 544, 545; 47 Nev. 33 (Nev.  
24 1923), the Nevada Supreme Court stated:  
25

1 It is an unwritten law in the legal profession that an attorney may not be a witness in the  
2 cause he is conducting, except when essential to the ends of justice. Canon 19 of the  
Professional Ethics of the American Bar Association.

3 The Nevada Supreme Court expanded on this in *Tomlin v. State*, 407 P.2d 1020, 1022; 81 Nev.  
4 610, 623 (Nev. 1965), where it stated

5 The law is clear that a prosecutor is competent to testify and he may even be compelled  
6 to do so. *Robertson v. Commonwealth*, 269 Ky. 317, 107 S.W.2d 292 (1937); *Robinson*  
7 *v. United States*, 32 P.2d, 66 A.L.R. 468 (8<sup>th</sup> Cir. 1928); *United States v. Alu*, 246 F.2d  
8 29 (2<sup>nd</sup> Cir. 1957). However, this is strictly limited to those instances where his  
testimony is made necessary by the peculiar and unusual circumstances of the case. Even  
then, his functions as a prosecuting attorney and as a witness should be disassociated.

9 17. While these cases are different factually, they illustrate that courts can order the removal  
10 of an attorney from a case based on ethical rules, logic and norms, in addition to statutory or rules-  
11 based power to remove. The LACSN law firm's contentions are incorrect that the Court cannot  
12 remove it based upon violations of the Nevada Rules of Professional Conduct or if their  
13 representation is simply so bad that it is harming the protected person and her family, whom she  
14 loves and wants to see. The foregoing cases show that this Court can remove LACSN for violations  
15 of the Nevada Rules of Professional Conduct, as well and NRS 159 and/or Rule 9 of the Nevada  
16 Statewide Guardianship Rules, and as well based on this Court's Order appointing LACSN.

17 18. Furthermore, Rule 1.14 led to the disbarment of an attorney in Louisiana. *In Re Cofield*,  
18 937 So. 2d 330 (La. 2006) dealt with the disbarment proceedings for a lawyer who exploited a  
19 client with diminished capacity, a Mr. Davis, who he represented. The bar committee found that  
20 "Respondent also continued to deal directly with Mr. Davis after it was known that he was  
21 incapable of handling his affairs..." *Id*, 337. It found that "respondent continued to have repeated  
22 contact with Mr. Davis and took advantage of his deficient mental capacity...", *ibid.*, 342. The  
23 Louisiana Court ultimately ordered the disbarment of the attorney for exploiting a disabled person.  
24 If an attorney can be disbarred for exploiting a disabled person, there is no reason a law firm cannot  
25

1 be removed for willfully ignoring all evidence and refusing to acknowledge a protected person's  
2 diminished capacity and instead engaging in a continuous pattern of painful and expensive  
3 unnecessary litigation that has and will deplete the relationships of the family members the  
4 protected person loves as well as the protected person's estate.

5 19. LACSN erroneously argued without basis that only June can remove and replace it, and  
6 only at the beginning of the case. On page 4, lines 8-12 of its Partial Opposition, the LACSN law  
7 firm ignores the capacity issue and attempts to create new rules out of thin air regarding replacing  
8 court-appointed attorneys, when it states:

9 "Therefore, there is only one controlling factor that gives this Court the authority  
10 to remove the court-appointed attorney for the protected person in favor of a private  
11 attorney: when the protected person expresses a desire for a private attorney to be  
retained on their behalf. June has never expressed any such desire."

12 20. The record clearly shows June does not have capacity to make such decisions. The record  
13 also shows that she does not even know who her attorney is or even that she has an attorney at  
14 all. Upon information and belief, June could not pick her attorney out of a line up, could not  
15 recall the LACSN law firm, or the name of her attorney, and certainly could not call them even if  
16 she wanted to. Statewide Rules for Guardianship Rule 9(I) explicitly references the NRPC 1.14  
17 with regards to diminished capacity. LACSN must comply with the Rule 1.14 when a protected  
18 person lacks the requisite capacity to comprehend the legal situation she is being asked to direct.

19 21. To limit removal of court-appointed counsel to only when a proposed protected person or  
20 protected person expresses such a desire completely displaces all other portions of Rule 9  
21 regarding limiting representation to only defending due process when a protected person cannot  
22 direct legal affairs, such as June.

23  
24 **c. In The Alternative, LACSN Should Be Limited To Protecting June's Due Process**  
25 **Rights**

1 22. If this Court does not want to exercise its authority to remove LACSN from this case, this  
2 Court should issue Findings of Fact and Conclusions of Law and an Order limiting LACSN to  
3 only representing June's due process rights. The Court already found in its previous June 29<sup>th</sup>  
4 Order that LACSN has substituted its judgment in place of June and improperly claimed that June  
5 is directing this litigation and appeals. Issuing an Order limiting LACSN in this matter will be  
6 built upon the law of this case, as well as previous Findings and Conclusions to that effect. It  
7 would be giving power to the Court's previous Order. It would be compelling LACSN to do what  
8 it should have already done of its own accord.

9 **II. A Guardian Ad Litem Should be Appointed to Represent June's Best**  
10 **Interests**

11 23. According to the Nevada Statewide Rules for Guardianship, Rule 9(H),

12 The role of attorney for the protected person or proposed protected person is  
13 distinct from the role a guardian ad litem appointed under NRS 159.0455 or an  
14 investigator appointed under NRS 159.046. An attorney for the protected person  
15 or proposed protected person shall not serve as a guardian ad litem in the same  
16 case or in a related matter. An attorney for a protected person or proposed  
protected person shall not serve as the attorney for the guardian(s) in the same or  
related case.

17 24. The LACSN law firm is prohibited from acting as a guardian ad litem in this matter for  
18 June under Guardianship Rule 9(H). It is explicitly banned from advocating for her best interests,  
19 under Guardianship Rule 9(B). Given the clear record in this case regarding June's inability to  
20 direct legal affairs and general incapacity, the appointment of a permanent guardian ad litem would  
21 best serve the requirements of the rules and statutes. LACSN has claimed June is directing it, but  
22 that is impossible given that June does not have the capacity to remember or understand well  
23 enough to direct the LACSN law firm. LACSN has been substituting its own judgment in place  
24 of June's, effectively violating Rule 9(H).  
25

1       25. The LACSN law firm continues to oppose a GAL so that Legal Aid alone can be June's  
2 voice. LACSN argues that it must continue to advocate for June's "expressed wishes" long after  
3 those "expressed wishes" were addressed at the beginning of the case. On page 3, lines 5-8  
4 LACSN states:

5               "Legal Aid Center has consistently complied with its duty under Statewide Rules of  
6 Guardianship Rule 9 to advocate for June's expressed wishes, even when those wishes  
7 might be against her 'best interest'".

8       26. June's expressed wishes were fulfilled when Kimberly was finally cajoled into serving as  
9 guardian, in an effort, among other things, to bring more transparency to June's care and what  
10 Kimbelry was doing with her money. After that, June had no "expressed wishes" relevant to  
11 consequences or reality, as she lacks the capacity to express those wishes, yet the LACSN law  
12 firm continues to advocate for Kimberly to continue as Guardian, thereby aiding and abetting  
13 Kimberly's isolation and exploitation of June and Kimberly's repeated failures to follow the  
14 requirements of the statutes. This shows that LACSN neglected and ignored its "duty" to protect  
15 due process and the Protected Person's Bill of Rights. The LACSN law firm appears to be arguing  
16 that once a protected person has expressed a desire for a particular person to serve as guardian,  
17 even if that nomination was made many years ago under different circumstances, it is required to  
18 support that nomination no matter what, for all time, and isolation, mismanagement of medical  
19 care, financial exploitation by the nominated person means nothing.

20       27. LACSN has acted as if June was directing Legal Aid in its activities, even when June  
21 lacked capacity to direct LACSN from the very beginning of the case, when the medical records  
22 filed herein, and now this Court's own findings and conclusion establish that June cannot direct  
23 litigation. LACSN even filed its Writ of Prohibition and its Writ of Mandamus to prevent this  
24 Court from hearing directly from June and letting this Court assess for itself June's capacity.  
25

1 28. At some point when a protected person is incapacitated and incapable for directing their  
2 legal affairs, the attorney for the protected person needs to stop claiming its client is directing the  
3 litigation. Instead of merely admitting that it has exceeded its mandate and request the  
4 appointment of a guardian ad litem, LACSN willfully holds itself above the law and exceeds its  
5 mandate by advocating for its own interests.

6 29. By appointing a GAL and removing and replacing the LACSN law firm, or at least by  
7 mandating that LACSN acknowledge June's true limitations and limiting LACSN's  
8 representation to protecting June's due process rights, this Court will gain an additional and  
9 theoretically more independent voice. These revisions can assist the Court in reducing the  
10 extremely costly litigation in this case, preserving June's estate and stabilizing her family  
11 relationships which have been strained by LACSN's mishandling of this case.

12 30. However, the LACSN law firm continues to oppose such an appointment, even when June  
13 lacks the capacity to act for herself, arguing on page 8, lines 5-6 of its Partial Objection:

14 "There is no issue presently before this Court that requires the assistance of a  
15 guardian ad litem".  
16

17 31. This could not be further from the truth. A Guardian ad Litem would help protect June.  
18 According to Statewide Rules of Guardianship Rule 8(B), "[a] guardian ad litem shall zealously  
19 advocate for the best interest of the protected person or proposed protected person in a matter that  
20 will enable the court to determine the action that will be least restrictive and in the best interest  
21 of the protected person." The LACSN law firm is prohibited from advocating for June's best  
22 interests, yet this is what is necessary at this point.

23 32. A GAL is necessary because LACSN will not accept medical or other evidence of June's  
24 incapacity. It is acting like June is a fully competent client and that is hurting June's estate, June  
25

1 and her family. Although in most cases, the job of advocating for best interests of the protected  
2 person falls to the guardian, in this matter, the Guardian fears her voice on behalf of her mother  
3 is drowned out by LACSN's incessant vexatious, unethical, unnecessary and extremely expensive  
4 appeals as well as LACSN's obstinate objections to and stonewalling of nearly every single thing  
5 the Guardian is trying to do. These grave circumstances merit a guardian ad litem.

6 33. Guardian believes the cost of a guardian ad litem would pale in comparison to the cost of  
7 having an intractable LACSN law firm unreasonably and unethically opposing her every move  
8 and filing serial appeals at June's expense in a vain attempt to use June to get case law favorable  
9 to its overall objectives.

10 34. June could benefit from an additional neutral voice focused on what she really needs.

11 35. The LACSN law firm apparently does not want its representation of June limited in any  
12 manner, shape or form. Instead of accepting that its role from the very beginning should have  
13 been limited to protecting June's due process rights, LACSN acted in violation of its mandate and  
14 substituted its own judgment and acted for its own interests. This Court can correct this injustice  
15 by appointing a GAL to safeguard June's best interests.  
16

17 **PRAYER FOR RELIEF**

18 WHEREFORE, based upon the foregoing, Successor Guardian Robyn requests that the  
19 Court GRANT her Petition in its entirety and ORDER:

20 1. That June's established lack of capacity prevents her from directing the litigation in this  
21 matter.

22 2. That this Court remove Legal Aid of Southern Nevada for failing in its duties and appoint  
23 other counsel for June.

24 3. That, in the alternative, LACSN be directed in this case to limit its representation of June  
25 to protecting her due process rights pursuant to Statewide Rules of Guardian Rule 9, unless and



1 until the Court finds June has capacity to direct her legal affairs.

2 4. That a Guardian Ad Litem be permanently appointed to advocate for June's best interests.

3 5. That the Guardian is authorized to act as requested in the unopposed portions of the  
4 Petition for Instructions.

5 6. Any other relief that this Court so deem necessary and proper.

6 Dated this 2<sup>nd</sup> day of September, 2022.

8 MICHAELSON LAW

9 By: /s/ John Michaelson  
10 John P. Michaelson, Esq.  
11 Nevada Bar No. 7822  
12 1746 W. Horizon Ridge Parkway  
13 Henderson, NV 89012  
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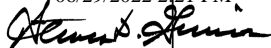
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**VERIFICATION**

Robyn Friedman, being first duly sworn, under penalty of perjury, hereby deposes and says: that she is a Petitioner in the *Reply to Partial Objection to Petition to Remove Legal Aid Center of Southern Nevada; Or, In the Alternative, to Limit the Scope of Court Appointed Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for Instructions Concerning Using Funds to Pay for Legal Services* 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.

/s/ Robyn Friedman  
ROBYN FRIEDMAN

# Exhibit 1

  
CLERK OF THE COURT

**FFCL**

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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: 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.<sup>1</sup> 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

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25 <sup>1</sup> 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 continued<sup>2</sup> 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.

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21 <sup>2</sup> 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.

23 *See* NRAP 8(c).

24 **NRAP 8(c)(1), Whether the object of the appeal or writ petition**  
25 **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.

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**Dated this 29th day of June, 2022**

**6EB 13D 2759 1587**  
**Linda Marquis**  
**District Court Judge**

/s/ John P. Michaelson

-24-

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

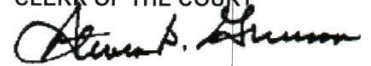
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11	Peter Pratt	peter@michaelsonlaw.com
12		
13		
14		

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		

# Exhibit 2



1 **NEOJ**

2 Maria L. Parra-Sandoval, Esq.

3 Nevada Bar No. 13736

4 [mparra@lacsns.org](mailto: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 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

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Telephone: (702) 386-1526

Facsimile: (702) 386-1526

*Attorney for Kathleen J. Jones, Protected Person*

**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  
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*Attorney for Petitioners*

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KEHOE & ASSOCIATES  
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Henderson, NV 89052  
*Attorney for Rodney G. Yeoman and Richard Powell*

David C. Johnson, Esq.  
JOHNSON & JOHNSON  
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*Attorney for Kimberly Jones*

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Medicaid Chief Eligibility and Payments  
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Magnolia, DE 19962

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Anaheim, CA 92805

Teri Butler  
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Dewey, AZ 86327

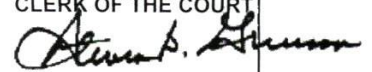
///



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  
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*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**

CLERK OF THE COURT

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.

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

# Exhibit 3

# Rule 1.14: Client with Diminished Capacity

Share:



## *Client-Lawyer Relationship*

- (a) When a client's capacity to make adequately considered decisions in connection with a representation is diminished, whether because of minority, mental impairment or for some other reason, the lawyer shall, as far as reasonably possible, maintain a normal client-lawyer relationship with the client.
- (b) When the lawyer reasonably believes that the client has diminished capacity, is at risk of substantial physical, financial or other harm unless action is taken and cannot adequately act in the client's own interest, the lawyer may take reasonably necessary protective action, including consulting with individuals or entities that have the ability to take action to protect the client and, in appropriate cases, seeking the appointment of a guardian ad litem, conservator or guardian.
- (c) Information relating to the representation of a client with diminished capacity is protected by Rule 1.6. When taking protective action pursuant to paragraph (b), the lawyer is impliedly authorized under Rule 1.6(a) to reveal information about the client, but only to the extent reasonably necessary to protect the client's interests.

[Comment](#) | [Table of Contents](#) | [Next Rule](#)

**ABA** American Bar Association

/content/aba-cms-

dotorg/en/groups/professional\_responsibility/publications/model\_rules\_of\_professional\_conduct/rule\_1\_14\_client\_with\_diminished\_capacity

# Rule 1.14 Client With Diminished Capacity - Comment

Share:



## *Client-Lawyer Relationship*

[1] The normal client-lawyer relationship is based on the assumption that the client, when properly advised and assisted, is capable of making decisions about important matters. When the client is a minor or suffers from a diminished mental capacity, however, maintaining the ordinary client-lawyer relationship may not be possible in all respects. In particular, a severely incapacitated person may have no power to make legally binding decisions. Nevertheless, a client with diminished capacity often has the ability to understand, deliberate upon, and reach conclusions about matters affecting the client's own well-being. For example, children as young as five or six years of age, and certainly those of ten or twelve, are regarded as having opinions that are entitled to weight in legal proceedings concerning their custody. So also, it is recognized that some persons of advanced age can be quite capable of handling routine financial matters while needing special legal protection concerning major transactions.

[2] The fact that a client suffers a disability does not diminish the lawyer's obligation to treat the client with attention and respect. Even if the person has a legal representative, the lawyer should as far as possible accord the represented person the status of client, particularly in maintaining communication.

[3] The client may wish to have family members or other persons participate in discussions with the lawyer. When necessary to assist in the representation, the presence of such persons generally does not affect the applicability of the attorney-client evidentiary privilege. Nevertheless, the lawyer must keep the client's interests foremost and, except for protective action authorized under paragraph (b), must look to the client, and not family members, to make decisions on the client's behalf.

[4] If a legal representative has already been appointed for the client, the lawyer should ordinarily look to the representative for decisions on behalf of the client. In matters involving a minor, whether the lawyer should look to the parents as natural guardians may depend on the type of proceeding or matter in which the lawyer is representing the minor. If the lawyer represents the guardian as distinct from the ward, and is aware that the guardian is acting adversely to the ward's interest, the lawyer may have an obligation to prevent or rectify the guardian's misconduct. See Rule 1.2(d).

## *Taking Protective Action*

[5] If a lawyer reasonably believes that a client is at risk of substantial physical, financial or other harm unless action is taken, and that a normal client-lawyer relationship cannot be maintained as provided in paragraph



(a) because the client lacks sufficient capacity to communicate or to make adequately considered decisions in connection with the representation, then paragraph (b) permits the lawyer to take protective measures deemed necessary. Such measures could include: consulting with family members, using a reconsideration period to permit clarification or improvement of circumstances, using voluntary surrogate decisionmaking tools such as durable powers of attorney or consulting with support groups, professional services, adult-protective agencies or other individuals or entities that have the ability to protect the client. In taking any protective action, the lawyer should be guided by such factors as the wishes and values of the client to the extent known, the client's best interests and the goals of intruding into the client's decisionmaking autonomy to the least extent feasible, maximizing client capacities and respecting the client's family and social connections.

[6] In determining the extent of the client's diminished capacity, the lawyer should consider and balance such factors as: the client's ability to articulate reasoning leading to a decision, variability of state of mind and ability to appreciate consequences of a decision; the substantive fairness of a decision; and the consistency of a decision with the known long-term commitments and values of the client. In appropriate circumstances, the lawyer may seek guidance from an appropriate diagnostician.

[7] If a legal representative has not been appointed, the lawyer should consider whether appointment of a guardian ad litem, conservator or guardian is necessary to protect the client's interests. Thus, if a client with diminished capacity has substantial property that should be sold for the client's benefit, effective completion of the transaction may require appointment of a legal representative. In addition, rules of procedure in litigation sometimes provide that minors or persons with diminished capacity must be represented by a guardian or next friend if they do not have a general guardian. In many circumstances, however, appointment of a legal representative may be more expensive or traumatic for the client than circumstances in fact require. Evaluation of such circumstances is a matter entrusted to the professional judgment of the lawyer. In considering alternatives, however, the lawyer should be aware of any law that requires the lawyer to advocate the least restrictive action on behalf of the client.

## Disclosure of the Client's Condition

[8] Disclosure of the client's diminished capacity could adversely affect the client's interests. For example, raising the question of diminished capacity could, in some circumstances, lead to proceedings for involuntary commitment. Information relating to the representation is protected by Rule 1.6. Therefore, unless authorized to do so, the lawyer may not disclose such information. When taking protective action pursuant to paragraph (b), the lawyer is impliedly authorized to make the necessary disclosures, even when the client directs the lawyer to the contrary. Nevertheless, given the risks of disclosure, paragraph (c) limits what the lawyer may disclose in consulting with other individuals or entities or seeking the appointment of a legal representative. At the very least, the lawyer should determine whether it is likely that the person or



entity consulted with will act adversely to the client's interests before discussing matters related to the client. The lawyer's position in such cases is an unavoidably difficult one.

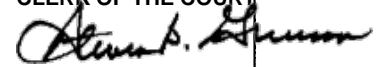
## Emergency Legal Assistance

[9] In an emergency where the health, safety or a financial interest of a person with seriously diminished capacity is threatened with imminent and irreparable harm, a lawyer may take legal action on behalf of such a person even though the person is unable to establish a client-lawyer relationship or to make or express considered judgments about the matter, when the person or another acting in good faith on that person's behalf has consulted with the lawyer. Even in such an emergency, however, the lawyer should not act unless the lawyer reasonably believes that the person has no other lawyer, agent or other representative available. The lawyer should take legal action on behalf of the person only to the extent reasonably necessary to maintain the status quo or otherwise avoid imminent and irreparable harm. A lawyer who undertakes to represent a person in such an exigent situation has the same duties under these Rules as the lawyer would with respect to a client.

[10] A lawyer who acts on behalf of a person with seriously diminished capacity in an emergency should keep the confidences of the person as if dealing with a client, disclosing them only to the extent necessary to accomplish the intended protective action. The lawyer should disclose to any tribunal involved and to any other counsel involved the nature of his or her relationship with the person. The lawyer should take steps to regularize the relationship or implement other protective solutions as soon as possible. Normally, a lawyer would not seek compensation for such emergency actions taken.

[Back to Rule](#) | [Table of Contents](#) | [Next Comment](#)

# Exhibit 4



**NOA**

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[ebrickfield@dlnevadalaw.com](mailto:ebrickfield@dlnevadalaw.com)  
*Guardian ad Litem for Kathleen Jones*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

In the Matter of the Guardianship of:

KATHLEEN JONES,

Protected Person.

Case No.: G-19-052263-A

Dept. No.: B

Hearing Date: May 31, 2021

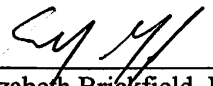
Hearing Time: 1:00 p.m.

**REPORT TO THE COURT**

Attached is Report from Elizabeth Brickfield, Esq., the appointed Guardian ad Litem  
Kathleen Jones, to the Honorable Linda Marquis, dated this March 29, 2021.

Dated: March 29, 2021.

DAWSON & LORDHAL PLLC

  
Elizabeth Brickfield, Esq. NSB #6236  
8925 West Post Road, Suite 210  
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Telephone: (702) 476-6440  
Facsimile: (702) 476-6442  
[ebrickfield@dlnevadalaw.com](mailto:ebrickfield@dlnevadalaw.com)  
*Guardian ad Litem for Kathleen Jones*

**CERTIFICATE OF SERVICE**

I hereby certify that on the day of 29<sup>th</sup> day of March 2021, I caused a true and correct copy of the Report to the Court filed on March 29, 2021, to be served through the Court's electronic filing system or by depositing the same in the United States mail in Las Vegas, Nevada, first class postage prepaid, address to the following parties:

Maria L. Parra-Sandoval, Esq.  
LEGAL AID OF SOUTHERN  
NEVADA  
725 E. Charleston Blvd.  
Las Vegas, NV 89104  
[mparra@lasn.org](mailto:mparra@lasn.org)  
*Attorney for Protected Person*

Ampersand Man  
2824 High Sail Court  
Las Vegas, Nevada 89117

Jen Adamo  
14 Edgewater Drive  
Magnolia, DE 19962

Courtney Simmons  
765 Kimbark Avenue  
San Bernardino, CA 92407

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

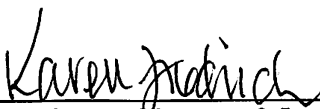
John P Michaelson  
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Jeffrey R. Sylvester, Esq.  
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*Attorneys for Guardian Kimberly Jones*

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Scott Simmons  
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Tiffany O'Neal  
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Orange, CA 92869

  
An Employee of Dawson & Lordahl PLLC



DAWSON · LORDAHL  
Trust, Estate, Business & Family Law

March 29, 2021

Hon. Linda Marquis  
Family Court Judge  
Eighth Judicial District Court  
Department B  
200 Lewis Avenue  
Las Vegas, NV 89155

Re: Guardianship of Kathleen June Jones G-19-052263-A

Dear Judge Marquis:

On February 16, 2021, you appointed me as Guardian ad Litem for Kathleen June Jones (the "Protected Person" or "Ms. Jones") on the following issues:

Scheduled opportunities for the Protected Person to elect to speak with and/or visit in person with her adult daughters<sup>1</sup> 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.

To meet the Court's assignment, I have done the following: (i) reviewed the pleadings relevant to the issues of visitation and communication and the Physician's Certificate and accompanying report; (ii) met with Ms. Jones by telephone on 2/24/21 and in person on 3/25/21; Ms. Jones was accompanied by LACSN counsel; (iii) met individually with Ms. Jones' five children by separate telephone or Zoom conferences; the children who are represented by counsel were accompanied by counsel. Each meeting with a child lasted approximately one hour; the two meetings with Ms. Jones totaled one hour.; and (iv) separate telephone conversations with the respective children's counsel.

I am reporting to the Court and the parties my conclusions and recommendations that I consider to be in Ms. Jones' best interest.

---

<sup>1</sup> Although the Court's order was addressed to the four daughters, Scott Simmons wants to interact with his mother.  
[www.DLNevadaLaw.com](http://www.DLNevadaLaw.com)

My conclusions are as follows:

- (1) Ms. Jones wants visits and communications with her children and grandchildren and these visits and communications are in her best interest;
- (2) Ms. Jones' children and grandchildren want to visit and communicate with her;
- (3) Ms. Jones' lacks the ability to manage, initiate or plan these communications and visits;
- (4) Kimberly Jones has not encouraged or facilitated these visits and communications; and
- (5) Kimberly Jones is unlikely to encourage and facilitate visits without supervision by the Court and even then the Court will be required to expend significant efforts to make sure the visitation occurs.

I am an attorney who has practiced in Nevada in the areas of estate planning, probate and trust administration, guardianship and related litigation matters for the past twenty-five years. If Ms. Jones were to present to me as a potential client, I would decline to prepare estate planning documents for her in the absence of a concurrent medical opinion by a board-certified physician that she has testamentary capacity.

Ms. Jones is well cared for. She was well groomed, the house was clean with clear spaces allowing Ms. Jones use her walker and the dog was well groomed and well behaved. Ms. Jones uses a walker and needs assistance rising from patio chairs. It is apparent that she is in good physical health.

Although my conversations with Ms. Jones were directed and limited to the issues that the Court asked me to address, it is apparent to me that Ms. Jones' mental decline is more advanced than her physical decline, that she lacks the ability to comprehend or answer compound questions and that she lacks decision making ability or schedule management. It is clear to me that Ms. Jones has no concept of time or numbers: her descriptions of when she had last seen or spoken with each of her four children were about "a week" or "the last two weeks". She has specific recollections of the place where she last saw one daughter. Ms. Jones told me her husband Jerry was dead. She volunteered that she would be moving to Anaheim and that she wanted to move to the Anaheim home. She could not tell me when she was moving.

In our conversation, Kimberly told me that Ms. Jones had recently lunched with a friend. When I asked Ms. Jones about eating out, she guessed that she had eaten out with Kimberly. She could not tell me the correct number of her grandchildren, but told me that she had recently spoken with Cameron and Courtney (Scott's children).

Ms. Jones is very clear that she wants to see all of her children and grandchildren, that she wants to see them in her home, in their homes, on overnights and vacations. Ms. Jones wants to spend time with her family members. She appears to be at that point in time when she will enjoy plans that have been made for her or visits in her home with

family members, but that she no longer has the ability to initiate such plans.

Ms. Jones wants to communicate with her children and grandchildren by telephone. She tells me that her children and grandchildren call her, she does not call them. Ms. Jones is hard of hearing, deaf in one ear and dislikes wearing her hearing aid. She tells me that she prefers a telephone with a receiver, i.e. a landline. Ms. Jones and her children tell me that telephone conversations with Ms. Jones tend to be of short duration (two to four minutes). Mw own experience with Ms. Jones demonstrated the difficulties she has with a cell phone.

In our first conversation, Ms. Jones told me that she did not want a schedule for visits and telephone calls. She did not raise that topic at our in-person meeting. However, because Ms. Jones lacks the ability or desire to initiate telephone calls or schedule visits, it is in Ms. Jones' best interest to have a caregiver or guardian who encourages and arranges for such visits working with the children and grandchildren to ensure that the visits and telephone calls happen. In other words, given Ms. Jones' expressed desire to see and communicate with her children and grandchildren, their desire to see and communicate with their parent/grandparent, Ms. Jones' guardian should make this family interaction a top priority for the quality of Ms. Jones' life.

Ms. Jones' guardian should be facilitating and encouraging the mutual desire of parent and child to visit and communicate with each other on a regular basis. This does not have to be done with a planned schedule that Ms. Jones knows and consents to – frankly, I don't believe that Ms. Jones has the ability to comprehend or follow such a schedule.

This is not a family law custody matter. But most families communicate with each other to coordinate their visits and calls with their parents, as their parents age. They want to be sure that each sibling can visit with the parent and they want to be sure that the parent has a regular stream of family visitors and interactions. They want to help and they want to give the caregiver a break. Ms. Jones is fortunate that her children want to spend time with her, to make sure that she is ok and to enjoy her remaining time with her children and grandchildren. It is her guardian's responsibility to make this happen.

Even though we are talking about her mother and siblings., my concern is that Kimberly does not comprehend the desire of her mother and family members to interact with Ms. Jones. Kimberly does not understand or agree that these interactions when they occur in Ms. Jones' home should be outside of Kimberly's presence. In my conversation with Kimberly, she made clear that she will not agree that her siblings can visit Ms. Jones in her home without Kimberly's presence. Nor does she agree that she will encourage other visits or vacations between her mother and her siblings. She told me that she "would make" her mother visit with one particular sibling. That is not the language of a guardian working to encourage and facilitate the Protected Person's desire to visit and communicate with her children and grandchildren. Statements from all the children indicate that when these visits happen there is a lack of advance planning and sporadic

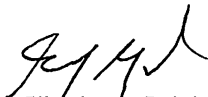
visitation with their mother since Kimberly became the guardian. Telephone calls or visits occur on short notice and at times that are close to court hearings. Children complain that they call their mother and their calls are not returned. It is unclear what notice June has of these proposed visits, that the duration has been explained to her or that she understands that she will return home and when.

Finally, Ms. Jones has indicated to me that she wants her children to know of her medical conditions and that she has made decisions for the disposition of her remains. Again, the ability to know your parent's medical conditions and to be able to say a final goodbye are inherent in the concept of visitation.

In summary, Ms. Jones' guardian, working with her children, must establish a mutually agreeable plan for Ms. Jones' interaction with her children and grandchildren that takes into account Ms. Jones' declining mental abilities, her desire to visit and communicate with her children and grandchildren, their desire to see and communicate with her and her declining physical abilities. Ms. Jones' guardian must encourage her interaction with her children and grandchildren. The plan should take into account how access will continue as Ms. Jones declines.

Visits and communications with family members is a basic right of every protected person. This Court should insist that Ms. Jones' rights and desires be carried out through a plan created with the involvement of all of Ms. Jones' children and put in place by the guardian.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Brickfield', with a stylized, cursive script.

Elizabeth Brickfield

Guardian ad Litem



[Skip to Main Content](#) [Logout](#) [My Account](#) [Search Menu](#) [New Family Record Search](#) [Refine Search](#) [Back](#)
Location : Family [Help](#)**REGISTER OF ACTIONS****CASE No. G-19-052263-A**

In the Matter of the Guardianship of: Kathleen Jones, Protected Person(s) §

§  
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Case Type: **Guardianship of Adult**  
 Subtype: **General - Person & Estate**  
 Date Filed: **09/19/2019**  
 Location: **Department B**  
 Cross-Reference Case Number: **G052263**  
 Supreme Court No.: **81414**  
**81799**  
**83967**  
**84655**

**PARTY INFORMATION**

**Guardian of Person and Estate**     **Friedman, Robyn**

**Lead Attorneys**  
**John P. Michaelson**  
*Retained*  
 7027312333(W)

**Objector**     **Jones, Kimberly**

**Pro Se**

**Petitioner**     **Friedman, Robyn**

**John P. Michaelson**  
*Retained*  
 7027312333(W)

**Petitioner**     **Simmons, Donna**

**John P. Michaelson**  
*Retained*  
 7027312333(W)

**Protected Person**     **Jones, Kathleen June**

**Elizabeth R. Mikesell**  
*Retained*  
 702-386-1533(W)

**EVENTS & ORDERS OF THE COURT****OTHER EVENTS AND HEARINGS**

09/19/2019 **Ex Parte     Doc ID# 1**  
*[1] Ex Parte Petition for Appointment of Temporary Guardian of the Person and Estate and Issuance of Letters of Temporary Guardianship*

09/19/2019 **Physicians Certificate     Doc ID# 2**  
*[2] Confidential Physician's Certificate of Incapacity and Medical Records*

09/19/2019 **Citation to Appear and Show Cause     Doc ID# 3**  
*[3] Citation to Appear and Show Cause*

09/19/2019 **Citation to Appear and Show Cause     Doc ID# 4**  
*[4] Amended Citation to Appear and Show Cause*

09/20/2019 **Certificate of Service     Doc ID# 5**  
*[5] Certificate of Service*

09/23/2019 **Order Appointing Temporary Guardian - Person & Estate     Doc ID# 6**  
*[6] Order Appointing Temporary Guardian - Person & Estate*

09/23/2019 **Notice of Entry of Order     Doc ID# 7**  
*[7] 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*

09/23/2019 **Letters of Temporary Guardianship     Doc ID# 8**  
*[8] Letters of Temporary Guardianship*

09/25/2019 **Order Appointing Counsel     Doc ID# 9**  
*[9] oac*

09/25/2019 **Affidavit of Service     Doc ID# 10**  
*[10] Affidavit of Service*

09/27/2019 **Statement of Legal Aid Representation and Fee Waiver     Doc ID# 11**  
*[11] Statement of Legal Aid Representation and Fee Waiver*

09/27/2019 **Notice of Entry of Order     Doc ID# 12**  
*[12] Notice of Entry of Order*

10/01/2019 **Notice of Appearance     Doc ID# 13**  
*[13] Notice of Appearance and Request for Notice*

10/02/2019 **Opposition and Countermotion     Doc ID# 14**  
*[14] Opposition to Appointment of Temporary Guardian and General Guardian; Counter-Petition for Appointment of Temporary Guardian of the Person and Estate and Issuance of Letters of Temporary Guardianship; and Counter-Petition for Appointment of General Guardian of the Person and Estate and Issuance of Letters of General Guardianship*

10/02/2019 **Confidential Information Sheet - Guardianship     Doc ID# 15**

10/02/2019 [15] Confidential Information Sheet - Guardianship - Identification for proposed guardian  
**Opposition Doc ID# 16**  
[16] Opposition to Ex Parte Petition for Appointment of Temporary and General Guardian of the Person and Estate; and Alternatively, Counter-Petition for Appointment of Kimberly Jones as Temporary and General Guardian of the Person and Estate

10/02/2019 **Care Plan Doc ID# 17**  
[17] Proposed Care Plan

10/02/2019 **Supplement Doc ID# 18**  
[18] Supplement to Counter-Petition for Appointment of Kimberly Jones as Temporary and General Guardian of the Person and Estate

10/02/2019 **Notice of Appearance Doc ID# 19**  
[19] Notice of Appearance and Request for Notice

10/02/2019 **Certificate of Service Doc ID# 20**  
[20] Certificate of Service

10/02/2019 **Supplement Doc ID# 21**  
[21] Supplement for Hearing on October 3, 2019

10/03/2019 **Hearing for Temporary Guardianship (9:00 AM)** (Judicial Officer Marquis, Linda)  
Result: Matter Heard

10/03/2019 **Opposition & Countermotion (9:00 AM)** (Judicial Officer Marquis, Linda)  
Opposition to Appointment of Temporary Guardian and General Guardian; Counter-Petition for Appointment of Temporary Guardian of the Person and Estate and Issuance of Letters of Temporary Guardianship; and Counter-Petition for Appointment of General Guardian of the Person and Estate and Issuance of Letters of General Guardianship  
Result: Matter Heard

10/03/2019 **All Pending Motions (9:00 AM)** (Judicial Officer Marquis, Linda)  
Parties Present  
Result: Matter Heard

10/03/2019 **Order Granting Doc ID# 22**  
[22] Order Extending Temporary Guardianship

10/03/2019 **Notice of Entry of Order Doc ID# 23**  
[23] Notice of Entry of Order Extending Temporary Guardianship

10/04/2019 **Order Doc ID# 24**  
[24] order

10/04/2019 **Notice of Entry Doc ID# 25**  
[25] Notice of Entry of Order

10/10/2019 **Notice of Telephonic Hearing Doc ID# 26**  
[26] Notice of Intent to Appear by Communication Equipment for Scott Simmons

10/11/2019 **Proof of Service Doc ID# 27**  
[27] Proof of Service-Opposition and Counter-Petition of Gerry Yeoman

10/11/2019 **Supplement Doc ID# 28**  
[28] Supplement to Opposition and Counter-Petition filed on October 2, 2019

10/11/2019 **Declaration Doc ID# 29**  
[29] Declaration of Rodney Gerald Yeoman

10/11/2019 **Notice of Intent to Move Protected Person Doc ID# 30**  
[30] Notice of Intent to Move the Protected Person

10/14/2019 **Certificate of Service Doc ID# 31**  
[31] Certificate of Service

10/14/2019 **Reply to Opposition Doc ID# 32**  
[32] Reply to Oppositions Filed

10/15/2019 **Citation to Appear (10:00 AM)** (Judicial Officer Marquis, Linda)  
Amended Citation to Appear and Show Cause  
Parties Present  
10/10/2019 Reset by Court to 10/15/2019  
Result: Matter Heard

10/15/2019 **Supplemental Doc ID# 33**  
[33] Supplement to Oppositions Filed

10/15/2019 **Order to Appoint State Investigator Doc ID# 34**  
[34] Order to Appoint Investigator

10/15/2019 **Order to Appoint State Investigator Doc ID# 35**  
[35] Order to Appoint Investigator

10/16/2019 **Notice of Entry Doc ID# 36**  
[36] Notice of Entry

10/31/2019 **Order Doc ID# 37**  
[37] Order

11/06/2019 **Minute Order (3:30 PM)** (Judicial Officer Marquis, Linda)  
Result: Minute Order - No Hearing Held

11/13/2019 **Notice of Change of Address Doc ID# 38**  
[38] Notice Change Address

11/22/2019 **Notice of Association of Counsel Doc ID# 39**  
[39] Notice of Association of Counsel

11/22/2019 **Petition Doc ID# 40**  
[40] Petition for Return of Property of Protected Person

11/22/2019 **Petition Doc ID# 41**  
[41] Petition for Confirmation to Bring Civil Actions on Behalf of Kathleen June Jones

11/22/2019 **Lis Pendens Doc ID# 42**  
[42] Notice of Lis Pendens

11/25/2019 **Status Check (8:30 AM)** (Judicial Officer Marquis, Linda)  
Review Competing Orders

11/25/2019 **Order Doc ID# 43**  
[43] Order from October 15, 2019 Hearing

11/25/2019 **Notice of Entry of Order Doc ID# 44**  
[44] Notice of Entry of Order

11/27/2019 **Adult Guardianship - Letters of Guardianship Doc ID# 45**  
[45] Letters of Guardianship

12/02/2019 **Request Doc ID# 46**

12/02/2019 [46] Request for Hearing  
**Clerk's Notice of Hearing Doc ID# 47**  
[47] Clerk's Notice of Hearing

12/03/2019 **Order Shortening Time Doc ID# 48**  
[48] Order Shortening Time

12/03/2019 **Notice of Entry of Order Doc ID# 49**  
[49] Notice of Entry of Order Shortening Time and Notice of Hearing

12/06/2019 **Opposition to Motion Doc ID# 50**  
[50] Opposition to Petition for Return of Property of Protected Person

12/06/2019 **Opposition to Motion Doc ID# 51**  
[51] Opposition to Petition for Confirmation to Bring Civil Actions on behalf of Kathleen June Jones

12/09/2019 **Reply Doc ID# 52**  
[52] Reply in Support of Petition for Return of Property of Protected Person

12/09/2019 **Reply Doc ID# 53**  
[53] Reply in Support of Petition for Confirmation to Bring Civil Actions on Behalf of Kathleen June Jones

12/09/2019 **Notice of Intent to Move Protected Person Doc ID# 54**  
[54] Notice of Intent to Appear by Communication Request

12/10/2019 **Hearing (9:30 AM) (Judicial Officer Marquis, Linda)**  
Petition for Return of Property of Protected Person and Petition for Confirmation to Bring Civil Actions of Behalf of Kathleen June Jones  
01/03/2020 Reset by Court to 12/10/2019  
Result: Granted

12/10/2019 **Opposition (9:30 AM) (Judicial Officer Marquis, Linda)**  
Rodney G. Yeoman's Opposition to Petition for Return of Property of Protected Person  
Result: Denied

12/10/2019 **Opposition (9:30 AM) (Judicial Officer Marquis, Linda)**  
Rodney Gerald Yeoman's Opposition to Petition for Confirmation to Bring Civil Actions on behalf of Kathleen June Jones  
Result: Denied

12/10/2019 **Hearing (9:30 AM) (Judicial Officer Marquis, Linda)**  
Reply in Support of Petition for Return of Property of Protected Person  
Result: Granted

12/10/2019 **Hearing (9:30 AM) (Judicial Officer Marquis, Linda)**  
Reply in Support of Petition for Confirmation to bring Civil Actions on Behalf of Kathleen June Jones  
Result: Matter Heard

12/10/2019 **All Pending Motions (9:30 AM) (Judicial Officer Marquis, Linda)**  
Parties Present  
Result: Matter Heard

12/13/2019 **Inventory, Appraisal and/or Record of Value Doc ID# 55**  
[55] Inventory, Appraisal and Record of Value

12/23/2019 **Order Granting Doc ID# 56**  
[56] Order Granting Motion for Return of Property of Protected Person and Motion for Confirmation to Bring Civil Actions on Behalf of Kathleen June Jones

12/23/2019 **Notice of Entry of Order Doc ID# 57**  
[57] Notice of Entry of Order

01/06/2020 **Report and Recommendations Doc ID# 58**  
[58] Financial Forensic Audit - Request for Extension for Audit of Estate of Kathleen Jones

01/08/2020 **Report and Recommendations Doc ID# 59**  
[59] Confidential Report of Investigator

01/13/2020 **Notice of Telephonic Hearing Doc ID# 60**  
[60] Notice of Intent to Appear by Communication Equipment

01/14/2020 **Return Hearing (1:30 PM) (Judicial Officer Marquis, Linda)**  
Investigation Report  
Parties Present  
Result: Matter Heard

01/15/2020 **Notice Doc ID# 61**  
[61] Notice of Intent to Seek Payment of Attorneys' Fees and Costs from Guardianship Estate

01/15/2020 **Petition Doc ID# 62**  
[62] Petition for Payment of Guardian's Attorneys' Fees and Costs

01/16/2020 **Clerk's Notice of Hearing Doc ID# 63**  
[63] Clerk's Notice of Hearing

01/16/2020 **Notice of Hearing Doc ID# 64**  
[64] Notice of Hearing

01/16/2020 **Supplemental Exhibits Doc ID# 65**  
[65] UCI Medical Record

01/24/2020 **Estimate of Transcript Doc ID# 66**  
[66] JANUARY 14, 2020

01/31/2020 **Transcript of Proceedings Doc ID# 67**  
[67] JANUARY 14, 2020

01/31/2020 **Transcript of Proceedings Doc ID# 68**  
[68] OCTOBER 15, 2019

01/31/2020 **Transcript of Proceedings Doc ID# 69**  
[69] DECEMBER 10, 2019

01/31/2020 **Transcript of Proceedings Doc ID# 70**  
[70] OCTOBER 3, 2019

01/31/2020 **Final Billing of Transcript Doc ID# 73**  
[73] OCTOBER 3, 2019; OCTOBER 15, 2019; DECEMBER 10, 2019; JANUARY 14, 2020

02/05/2020 **Notice of Appearance Doc ID# 71**  
[71] Notice of Appearance

02/05/2020 **Notice of Withdrawal Doc ID# 72**  
[72] Notice of Withdrawal

02/06/2020 **Motion for Protective Order Doc ID# 74**  
[74] Motion for Protective Order

02/06/2020 **Clerk's Notice of Hearing Doc ID# 75**

02/06/2020 [75] Clerk's Notice of Hearing  
**Notice of Association of Counsel Doc ID# 76**  
[76] Notice of Association of Counsel

02/06/2020 **Joinder Doc ID# 77**  
[77] Robyn Friedman and Donna Simmons' Joinder to Kimberly Jones' Motion For Protective Order

02/07/2020 **Stipulation and Order Doc ID# 78**  
[78] Stipulation and Order on Petition for Return of Property of Protected Person

02/07/2020 **Notice of Entry of Stipulation and Order Doc ID# 79**  
[79] Notice of Entry of Stipulation and Order

02/07/2020 **Minute Order (7:30 AM)** (Judicial Officer Marquis, Linda)  
Result: Minute Order - No Hearing Held

02/07/2020 **Response Doc ID# 80**  
[80] Response to Petition for Payment of Guardian's Attorney's Fees and Costs Filed 1/15/2020

02/11/2020 **Objection Doc ID# 81**  
[81] Protected Person's Objection to Petition for Payment of Guardian's Attorney's Fees and Costs

02/11/2020 **Notice Doc ID# 82**  
[82] Notice of Intent to Appear by Communication Equipment

02/12/2020 **Budget Doc ID# 83**  
[83] Monthly Budget

02/12/2020 **Reply Doc ID# 84**  
[84] Omnibus Reply to Response and Objection to the Petition for Payment of Guardian's Attorney Fees and Costs

02/12/2020 **Notice of Association of Counsel Doc ID# 85**  
[85] Notice of Association of Counsel and Request for Notice

02/12/2020 **Amended Certificate of Mailing Doc ID# 86**  
[86] Amended Certificate of Mailing

02/13/2020 **Hearing (10:00 AM)** (Judicial Officer Marquis, Linda)  
Petition for Payment of Guardian's Atty's Fees and Costs  
Result: Matter Heard

02/13/2020 **Objection (10:00 AM)** (Judicial Officer Marquis, Linda)  
Protected Person's Objection to Petition for Payment of Guardian's attorneys Fees and Cost  
Result: Matter Heard

02/13/2020 **Hearing (10:00 AM)** (Judicial Officer Marquis, Linda)  
Reponse to Petition for Payment of Guardian's Attorney's Fees and Costs Filed 01/15/2020  
Result: Matter Heard

02/13/2020 **Hearing (10:00 AM)** (Judicial Officer Marquis, Linda)  
Omnibus Reply to the Response and Objection to the Petition for Payment of Guardian's Attorney Fees and Costs  
Result: Matter Heard

02/13/2020 **Petition Doc ID# 87**  
[87] Petition For Approval of Attorneys Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate

02/13/2020 **All Pending Motions (10:00 AM)** (Judicial Officer Marquis, Linda)  
Parties Present  
Result: Under Advisement

02/14/2020 **Clerk's Notice of Hearing Doc ID# 88**  
[88] Clerk's Notice of Hearing

02/18/2020 **Certificate of Service Doc ID# 89**  
[89] Certificate of Service

02/20/2020 **CANCELED Evidentiary Hearing (1:30 PM)** (Judicial Officer Marquis, Linda)  
Vacated - per Stipulation and Order  
Evidentiary Hearing/Status Check

02/20/2020 **Opposition Doc ID# 90**  
[90] Opposition to Motion for Protective Order

02/21/2020 **Notice Doc ID# 91**  
[91] Notice of Intent to Seek Payment of Attorneys' Fees and Costs from Guardianship Case

02/21/2020 **Supplemental Doc ID# 92**  
[92] Supplemental Brief to Petition for Payment of Guardian's Attorney Fees and Costs; or, Alternatively, Motion to Reconsider

02/26/2020 **Notice of Telephonic Hearing Doc ID# 93**  
[93] Notice of Intent to Appear by Communication Equipment

02/26/2020 **Response Doc ID# 94**  
[94] Response to Guardian's Supplemental Brief to Petition for Payment of Attorney Fees and Costs; or Alternatively, Motion to Reconsider

03/02/2020 **Status Check (8:30 AM)** (Judicial Officer Marquis, Linda)  
Review pleadings after 1/15 and issue a written Order  
Result: Matter Continued

03/02/2020 **Minute Order (2:30 PM)** (Judicial Officer Marquis, Linda)  
Result: Minute Order - No Hearing Held

03/03/2020 **Joinder Doc ID# 95**  
[95] Protected Person's Joinder to Guardian's Motion for Protective Order

03/03/2020 **Reply Doc ID# 96**  
[96] Reply in Support of Motion for Protective Order

03/04/2020 **Objection Doc ID# 97**  
[97] Kathleen June Jone's Objection to Petition for Approval of Attorneys Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate

03/10/2020 **Reply Doc ID# 98**  
[98] Reply In Support of Motion for Protective Order

03/11/2020 **Opposition Doc ID# 99**  
[99] Opposition to Friedman and Simmons' Petition for Approval of Attorneys' Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate; and Joinder to Kathleen June Jones' Objection

03/12/2020 **Joinder Doc ID# 100**  
[100] Joinder in Oppositions to Petition for Approval of Attorney s Fees And Costs and Request to Enter a Judgment Against the Real Property of the Estate

03/12/2020 **Response Doc ID# 101**  
[101] RESPONSE TO (1) KATHLEEN JUNE JONES OBJECTION TO PETITION FOR APPROVAL OF ATTORNEYS FEES AND COSTS AND REQUEST TO ENTER A JUDGMENT AGAINST THE REAL PROPERTY OF THE ESTATE; (2) RESPONSE TO KIMBERLY JONES JOINDER TO OBJECTION TO FRIEDMAN AND SIMMONS PETITION FOR APPROVAL OF ATTORNEYS FEES AND COSTS AND REQUEST TO ENTER

A JUDGMENT AGAINST THE REAL PROPERTY OF THE ESTATE; AND (3) RESPONSE TO JOINDER TO OPPOSITION TO PETITION FOR APPROVAL OF ATTORNEY S FEES AND COSTS AND REQUEST TO ENTER A JUDGMENT AGAINST THE REAL PRPERTY OF THE ESTATE FILED BY RODNEY GERALD YEOMAN

03/13/2020 **Minute Order** (3:15 PM) (Judicial Officer Marquis, Linda)  
Result: Minute Order - No Hearing Held

03/13/2020 **Report and Recommendations** **Doc ID# 102**  
[102] Financial Forensic Audit of the Estate of Kathleen Jones

03/13/2020 **Order** **Doc ID# 103**  
[103] Order on Petition for Payment of Guardian's Attorney's Fees and Costs

03/16/2020 **CANCELED Status Check** (8:30 AM) (Judicial Officer Marquis, Linda)  
Vacated - per Order

03/16/2020 **Notice of Telephonic Hearing** **Doc ID# 104**  
[104] Notice of Telephonic Appearance - Kathleen Jones - Financial Forensic Specialist Report

03/16/2020 **Notice of Entry** **Doc ID# 105**  
[105] Notice of Entry

03/18/2020 **Notice** **Doc ID# 106**  
[106] Notice of Intent to Appear by Communication Equipment

03/26/2020 **Ex Parte Application for Order** **Doc ID# 107**  
[107] Ex Parte Application for Order for Hearing on Shortened Time; Petition for Payment of Guardian's Attorney Fees and Costs; and Petition to Withdraw as Counsel for Guardian

03/26/2020 **Certificate of Service** **Doc ID# 108**  
[108] Certificate of Service

03/30/2020 **Order Shortening Time** **Doc ID# 109**  
[109] Order Shortening Time

03/30/2020 **Notice of Telephonic Hearing** **Doc ID# 110**  
[110] Notice of Intent to Appear by Telephonic Transmission Equipment

03/30/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 111**  
[111] Audiovisual Transmission Equipment Appearance Request

03/30/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 112**  
[112] Audiovisual Transmission Equipment Appearance Consent

03/30/2020 **Certificate of Mailing** **Doc ID# 113**  
[113] Amended Certificate of Mailing

03/31/2020 **Notice of Telephonic Hearing** **Doc ID# 114**  
[114] Notice of Intent to Appear By Telephonic Transmission Equipment

04/01/2020 **Notice** **Doc ID# 115**  
[115] Notice of Intent to Appear By Communication Equipment

04/01/2020 **Notice** **Doc ID# 116**  
[116] Notice of Intent to Appear by Communication Equipment

04/01/2020 **Objection** **Doc ID# 117**  
[117] Kathleen June Jone's Partial Objection to Ex Parte Petition for Order for Hearing on Shortened Time; Petition for Payment of Guardian's Attorney Fees and Costs; and Petition to Withdraw as Counsel for Guardian

04/02/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 118**  
[118] Notice of Intent to Appear by Communication Equipment for Ty Kehoe, Esq.

04/02/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 119**  
[119] Notice of Intent to Appear by Communication Equipment for Rodney Gerry Yeoman

04/02/2020 **Supplement** **Doc ID# 120**  
[120] Supplement to Opposition to Motion for Protective Order

04/02/2020 **Minute Order** (8:00 AM) (Judicial Officer Marquis, Linda)  
Result: Minute Order - No Hearing Held

04/06/2020 **Notice of Telephonic Hearing** **Doc ID# 121**  
[121] Notice of Intent to Appear by Communication Equipment

04/13/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 122**  
[122] Audiovisual Transmission Equipment Appearance Request

04/13/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 123**  
[123] Audiovisual Transmission Equipment Appearance Consent

04/13/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 124**  
[124] Notice of Intent to Appear by Communication Equipment for Ty Kehoe, Esq.

04/13/2020 **Audiovisual Transmission Equipment Appearance Request** **Doc ID# 125**  
[125] Notice of Intent to Appear by Communication Equipment for Rodney Gerry Yeoman

04/14/2020 **Notice** **Doc ID# 126**  
[126] Notice of Intent to Appear by Communication Equipment

04/14/2020 **Notice** **Doc ID# 127**  
[127] Notice of Intent to Appear By Communication Equipment

04/14/2020 **Notice of Telephonic Hearing** **Doc ID# 128**  
[128] Notice of Intent to Appear by Telephonic Transmission Equipment

04/14/2020 **Notice** **Doc ID# 129**  
[129] Notice of Intent to Appear By Telephone

04/14/2020 **Petition to Resign/Remove Guardian** **Doc ID# 130**  
[130] Petition for Removal of Guardian and for Return of Protected Person's Property

04/14/2020 **Physicians Certificate** **Doc ID# 131**  
[131] Confidential Documents

04/14/2020 **Citation Electronically Issued/Filed** **Doc ID# 132**  
[132] Citation

04/14/2020 **Clerk's Notice of Hearing** **Doc ID# 133**  
[133] Clerk's Notice of Hearing

04/14/2020 **Notice** **Doc ID# 134**  
[134] Notice of Intent to Appear by Telephonic Transmission Equipment

04/15/2020 **Motion for Protective Order** (11:00 AM) (Judicial Officer Marquis, Linda)  
Motion for Protective Order  
03/17/2020 Reset by Court to 04/03/2020  
04/03/2020 Reset by Court to 04/15/2020  
Result: Granted in Part

04/15/2020 **Motion for Protective Order** (11:00 AM) (Judicial Officer Marquis, Linda)

Robyn Friedman and Donna Simmons' Joinder to Kimberly Jones' Motion for Protective Order  
 03/17/2020 Reset by Court to 04/03/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Matter Heard  
**Hearing** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Petition for Approval of Attorney's Fees and Costs and Request to enter a Judgment against the Real Property of the Estate*  
 03/17/2020 Reset by Court to 04/03/2020  
 03/17/2020 Reset by Court to 03/17/2020  
 03/17/2020 Reset by Court to 03/17/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Granted in Part  
**Opposition** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Opposition to Motion for Protective Order*  
 03/17/2020 Reset by Court to 04/03/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Matter Heard  
**Hearing** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Kimberly Jones' Reply in Support of Motion for Protective Order*  
 03/17/2020 Reset by Court to 04/03/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Matter Heard  
**Objection** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Kathleen June Jones's Objection to Petition for Approval of Attorneys Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate*  
 03/17/2020 Reset by Court to 04/03/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Matter Heard  
**Hearing** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Reply in Support of Motion for Protective Order*  
 03/17/2020 Reset by Court to 04/03/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Matter Heard  
**Opposition** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Opposition To Friedman And Simmons Petition For Approval Of Attorney s Fees And Costs And Request To Enter A Judgment Against The Real Property Of The Estate; And Joinder To Kathleen June Jones Objection*  
 03/17/2020 Reset by Court to 04/03/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Matter Heard  
**Hearing** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Response to (1) Kathleen June Jones' Objection to Petition for Approval of Attorneys' Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate; (2) Response to Kimberly Jones' Joinder to Objection to Friedman and Simmons' Petition for Approval of Attorneys' Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate and (3) Response to Joinder to Opposition to Petition for Approval of Attorney's Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate Filed by Rodney Gerald Yeoman*  
 03/17/2020 Reset by Court to 04/03/2020  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Matter Heard  
**Petition** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Payment of Guardians's Attorney Fees and Costs; and Petition to Withdraw as Counsel for Guardian*  
 04/03/2020 Reset by Court to 04/15/2020

04/15/2020 Result: Granted in Part  
**All Pending Motions** (11:00 AM) (Judicial Officer Marquis, Linda)  
Parties Present

04/16/2020 Result: Matter Heard  
**Certificate of Service** Doc ID# 135  
 [135] Certificate of Service

04/20/2020 **Report and Recommendations** Doc ID# 136  
 [136] Supplemental Financial Forensic Audit Report for the Estate of Kathleen Jones

04/27/2020 **Memorandum** Doc ID# 137  
 [137] Plaintiff Kimberly Jones' Memorandum of Points and Authorities in Support of Attorney Fees and Costs

04/27/2020 **Opposition** Doc ID# 138  
 [138] Opposition to Rodney Gerald Yeoman s ( Gerry ) Petition for Removal of Guardian and for Return of Protected Person s Property, Counterpetition for Attorney Fees and Costs Pursuant to NRS 159.1583(4), and Court Ordered Supplemental Opposition Concerning Discovery of Interested Parties Pursuant to NRS 159.047

05/05/2020 **Inventory, Appraisal and/or Record of Value** Doc ID# 139  
 [139] Inventory, Oath and Verified Record of Value

05/05/2020 **Petition** Doc ID# 140  
 [140] Petition for Discharge of Temporary Co-Guardians

05/05/2020 **Affidavit in Support** Doc ID# 141  
 [141] Affidavit of Robyn Friedman in Support of Petition for Discharge of Temporary Co-Guardians

05/05/2020 **Affidavit in Support** Doc ID# 142  
 [142] Affidavit of Donna Simmons in Support of Petition for Discharge of Temporary Co-Guardians

05/05/2020 **Certificate of Service** Doc ID# 143  
 [143] Certificate of Service - Inventory, Oath and Verified Record of Value

05/05/2020 **Estimate of Transcript** Doc ID# 149

05/06/2020 [149] APRIL 15, 2020  
**CANCELED Hearing** (10:00 AM) (Judicial Officer Marquis, Linda)  
*Vacated*  
*Petition for Removal of Guardian and for Return of Protected Person's Property*

05/06/2020 **Order Doc ID# 144**  
[144] *Order Granting Petition to Withdraw as Counsel for Guardian*

05/07/2020 **Notice of Hearing Doc ID# 145**  
[145] *Notice of Hearing on Petition to Discharge Temporary Co-Guardians*

05/07/2020 **Joinder Doc ID# 146**  
[146] *Kathleen June Jone's Joinder to Guardian's Opposition to Yeoman's Petition for Removal of Guardian and for Return of Protected Person's Property*

05/07/2020 **Notice of Entry of Order Doc ID# 147**  
[147] *Notice of Entry of Order*

05/08/2020 **Petition for Approval Doc ID# 148**  
[148] *Petition for Approval to Refinance Real Property of the Protected Person*

05/13/2020 **Audiovisual Transmission Equipment Appearance Request Doc ID# 150**  
[150] *Audiovisual Transmission Equipment Appearance Request*

05/13/2020 **Reply to Opposition Doc ID# 151**  
[151] *Reply to Opposition Re Petition for Removal of Guardian and for Return of Protected Person's Property*

05/14/2020 **Certificate of Service Doc ID# 152**  
[152] *Certificate of Service*

05/14/2020 **Order Shortening Time Doc ID# 153**  
[153] *Order Shortening Time*

05/14/2020 **Notice of Entry of Order Doc ID# 154**  
[154] *Notice of Entry of Order Shortening Time and Notice of Hearing*

05/14/2020 **Certificate of Service Doc ID# 155**  
[155] *Certificate of Service - NOH Petition for Discharge & Petition for Discharge*

05/14/2020 **Joinder Doc ID# 156**  
[156] *Robyn Friedman's and Donna Simmons' Joinder to Kimberly Jones' Opposition to Rodney Gerald Yeoman's Petition for Removal of Guardian*

05/14/2020 **Joinder Doc ID# 157**  
[157] *Robyn Friedman's and Donna Simmons Limited Joinder to Kimberly Jones' Petition For Approval to Refinance Real Property of the Protected Person*

05/14/2020 **Transcript of Proceedings Doc ID# 171**  
[171] *APRIL 15, 2020*

05/15/2020 **Final Billing of Transcript Doc ID# 178**  
[178] *APRIL 15, 2020*

05/18/2020 **Audiovisual Transmission Equipment Appearance Request Doc ID# 158**  
[158] *Audiovisual Transmission Equipment Appearance Request*

05/18/2020 **Audiovisual Transmission Equipment Appearance Request Doc ID# 159**  
[159] *Audiovisual Transmission Equipment Appearance Request*

05/18/2020 **Reply Doc ID# 160**  
[160] *Reply to Robyn Friedman's and Donna Simmons' Opposition Re Petition for Removal of Guardian and for Return of Protected Person's Property and Opposition to Petition for Sanctions*

05/18/2020 **Certificate of Service Doc ID# 161**  
[161] *Certificate of Service*

05/18/2020 **Response Doc ID# 162**  
[162] *Response to Petition for Approval to Refinance Real Property of the Protected Person*

05/18/2020 **Certificate of Service Doc ID# 163**  
[163] *Certificate of Service*

05/19/2020 **Certificate of Mailing Doc ID# 164**  
[164] *Certificate of Mailing*

05/20/2020 **Citation** (9:00 AM) (Judicial Officer Marquis, Linda)  
*Petition to Remove Guardian and Return of Protected Person's Property*  
Result: Denied

05/20/2020 **Opposition** (9:00 AM) (Judicial Officer Marquis, Linda)  
*Kimberly Jones s Opposition To Rodney Gerald Yeoman s Petition For Removal Of Guardian And For Return Of Protected Person s Property And Counterpetition For Attorney Fees And Costs Pursuant To NRS 159.1583(4) And Court Ordered Supplemental Opposition Concerning Discovery Of Interested Parties Pursuant To NRS 159.047*  
Result: Denied in Part

05/20/2020 **Hearing** (9:00 AM) (Judicial Officer Marquis, Linda)  
*Reply to Oppositions Re Petition for Removal of Guardian and for Return of Protected Person's Property*  
Result: Matter Heard

05/20/2020 **Petition for Approval** (9:00 AM) (Judicial Officer Marquis, Linda)  
*Refinance Real Property of the Protected Person*  
Result: Granted in Part

05/20/2020 **Hearing** (9:00 AM) (Judicial Officer Marquis, Linda)  
*Reply to Robyn Friedman's and Donna Simmons' Opposition RE Petition for Removal of Guardian and for Return of Protected Person's Property and Opposition to Petition for Sanctions*  
Result: Matter Heard

05/20/2020 **Hearing** (9:00 AM) (Judicial Officer Marquis, Linda)  
*Response to Petition for Approval to Refinance Real Property of the Protected Person*  
Result: Matter Heard

05/20/2020 **All Pending Motions** (9:00 AM) (Judicial Officer Marquis, Linda)  
Parties Present  
Result: Matter Heard

05/21/2020 **Order Doc ID# 165**  
[165] *ordr*

05/21/2020 **Notice of Entry of Order Doc ID# 166**  
[166] *Notice of Entry of Order*

05/26/2020 **Order Granting Doc ID# 167**  
[167] *Order Granting in Part Guardian's Petition for Attorney's Fees and Costs*

05/26/2020 **Estimate of Transcript Doc ID# 196**

[196] MAY 20, 2020  
05/28/2020 **Order Doc ID# 168**  
[168] Order Denying Rodney Gerald Yeoman's Petition for Removal of Guardian and for Return of Protected Person's Property and Denying Kimberly Jones's Counter-Petition for Attorney's Fees and Costs Pursuant to NRS 159.1853(4)  
05/29/2020 **Notice of Entry of Order Doc ID# 169**  
[169] Notice of Entry of Order  
05/29/2020 **Notice of Entry of Order Doc ID# 170**  
[170] Notice of Entry of Order  
05/29/2020 **Final Billing of Transcript Doc ID# 177**  
[177] MAY 20, 2020  
05/29/2020 **Transcript of Proceedings Doc ID# 194**  
[194] MAY 20, 2020  
05/29/2020 **Estimate of Transcript Doc ID# 195**  
[195] MAY 20, 2020  
06/04/2020 **Motion to Amend Judgment Doc ID# 172**  
[172] Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Decision and Order entered on May 21, 2020  
06/05/2020 **Clerk's Notice of Hearing Doc ID# 173**  
[173] Clerk's Notice of Hearing  
06/09/2020 **Stipulation and Order Doc ID# 174**  
[174]  
06/09/2020 **Notice of Entry of Stipulation and Order Doc ID# 175**  
[175] Notice of Entry of Stipulation and Order re Male Dog  
06/10/2020 **Opposition to Motion Doc ID# 176**  
[176] Kimberly Jones's Opposition to the Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Decision and Order entered on May 21, 2020 and Counter-Motion to Transfer to Chambers Calendar Without Oral Argument  
06/18/2020 **Joinder Doc ID# 179**  
[179] Kathleen June Jones' Joinder to Kimberly Jones' Opposition to Motion Pursuant to EDCR 2.24 NRCP 52, 59, and 60, Regarding the Decision and Order Entered on May 21, 2020 and Counter-Motion to Transfer to Chambers Calendar Without Oral Argument  
06/22/2020 **Order Granting Doc ID# 180**  
[180]  
06/22/2020 **Notice of Entry of Order Doc ID# 181**  
[181] Notice of Entry of Order  
06/23/2020 **Order Doc ID# 182**  
[182] Order Discharging  
06/23/2020 **Order Doc ID# 183**  
[183] Order Discharging Temporary Co-Guardians  
06/23/2020 **Order Doc ID# 184**  
[184] Order Discharging Temporary Co-Guardians  
06/24/2020 **Notice of Entry of Order Doc ID# 185**  
[185] Notice of Entry of Order - Order Discharging Temporary Co-Guardians  
06/25/2020 **Motion Doc ID# 186**  
[186] Kimberly Jones's Motion for Order Quieting Title, Directing Execution of Deed, and/or in the Alternative Petition for Instruction and Advice  
06/25/2020 **Motion to Consolidate Doc ID# 187**  
[187] Motion to Consolidate  
06/26/2020 **Clerk's Notice of Hearing Doc ID# 188**  
[188] Clerk's Notice of Hearing  
06/26/2020 **Clerk's Notice of Hearing Doc ID# 189**  
[189] Clerk's Notice of Hearing  
06/26/2020 **Notice of Appeal Doc ID# 190**  
[190] Notice of Appeal  
07/08/2020 **Notice Doc ID# 191**  
[191] Notice of Intent to Appear by Communication Equipment  
07/08/2020 **Reply to Opposition Doc ID# 192**  
[192] Reply to Opposition to Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Order Granting and Denying Kimberly Jones, as Guardian of the Protective [sic] Person's Motion for Protective Order entered on May 21, 2020  
07/13/2020 **Opposition Doc ID# 193**  
[193] Opposition to Motion to Consolidate  
07/15/2020 **CANCELED Motion (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)**  
Vacated  
Motion Pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60 Regarding the Decision and Order Entered on May 21, 2020  
07/15/2020 **CANCELED Opposition (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)**  
Vacated  
Kimberly Jones's Opposition to the Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Decision and Order entered on May 21, 2020 and Counter-Motion to Transfer to Chambers Calendar Without Oral Argument  
07/20/2020 **Status Check (8:30 AM) (Judicial Officer Marquis, Linda)**  
Review of Inspector's report (inspection of the property for necessary repairs) No appearance required  
Result: Minute Order - No Hearing Held  
07/20/2020 **Opposition Doc ID# 197**  
[197] Opposition to Kimberly Jones's Motion for Order Quieting Title, Directing Execution of Deed, and/or in the Alternative Petition for Instruction and Advice  
07/20/2020 **Certificate of Service Doc ID# 198**  
[198] Certificate of Service  
07/22/2020 **Reply Doc ID# 199**  
[199] Kimberly Jones's Reply in Support of Motion for Order Quieting Title, Directing Execution of Deed, and/or in the Alternative Petition for Instruction and Advice  
07/22/2020 **Reply Doc ID# 200**  
[200] Reply in Support of Motion to Consolidate  
07/27/2020 **Notice Doc ID# 201**  
[201] Notice of Intent to Appear by Communication Equipment  
07/30/2020 **Notice Doc ID# 202**  
[202] Notice of Intent to Appear by Communication Equipment  
07/31/2020 **Minute Order (12:40 PM) (Judicial Officer Marquis, Linda)**  
Result: Minute Order - No Hearing Held  
08/06/2020 **CANCELED Hearing (12:30 PM) (Judicial Officer Marquis, Linda)**



Vacated  
 Reply to Opposition to Motion Pursuant to E.D.C.R 2.24, N.R.C.P. 52, 59 And 60 Regarding the Decision and Order Entered on May 21, 2020  
 07/15/2020 Reset by Court to 08/06/2020

08/06/2020 CANCELED **Opposition** (12:30 PM) (Judicial Officer Marquis, Linda)  
 Vacated

08/06/2020 CANCELED **Motion** (12:30 PM) (Judicial Officer Marquis, Linda)  
 Vacated

08/12/2020 CANCELED **Motion to Consolidate** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Motion to Consolidate**  
 Motion to Consolidate

08/12/2020 CANCELED **Motion** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Opposition** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Opposition** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Opposition** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Opposition** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Hearing** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Hearing** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 CANCELED **Hearing** (9:30 AM) (Judicial Officer Steel, Cynthia Dianne)  
 Vacated

08/12/2020 **Order Granting** **Doc ID# 203**  
 [203] Order Granting Robyn Friedman's and Donna Simmons' Petition for Attorney Fees In Part

08/17/2020 **Notice of Entry of Order** **Doc ID# 204**  
 [204] Notice of Entry of Order

08/18/2020 **Motion** **Doc ID# 205**  
 [205] Motion for Status Check to Reset Vacated Hearing Dates

08/18/2020 **Notice of Hearing** **Doc ID# 206**  
 [206] Notice of Hearing

09/08/2020 **Notice** **Doc ID# 207**  
 [207] Notice of Intent to Appear by Communication Equipment

09/11/2020 **Notice of Appeal** **Doc ID# 208**  
 [208] Notice of Appeal

09/11/2020 **Case Appeal Statement** **Doc ID# 209**  
 [209] Case Appeal Statement

09/14/2020 **Certificate of Mailing** **Doc ID# 210**  
 [210] Certificate of Service

09/17/2020 **Motion to Rehear** (10:00 AM) (Judicial Officer Marquis, Linda)  
 Motion for Status Check to Reset Vacated Hearing Date  
Parties Present

09/18/2020 **Order** **Doc ID# 211**  
 [211] Exemplification Certificate

09/28/2020 **Notice** **Doc ID# 212**  
 [212] Notice of Intent to Appear by Communication Equipment

10/06/2020 **Suggestion of Death** **Doc ID# 213**  
 [213] Suggestion of Death Upon the Record Under NRCP 25(a)(2)

10/07/2020 **Status Check** (9:00 AM) (Judicial Officer Marquis, Linda)  
 (Cont from 9/17/20)  
Parties Present

10/10/2020 **Receipt of Copy** **Doc ID# 308**  
 [308] SEPTEMBER 17, 2021

10/10/2020 **Receipt of Copy** **Doc ID# 309**  
 [309] SEPTEMBER 17, 2020; OCTOBER 7, 2020

10/22/2020 **Estimate of Transcript** **Doc ID# 218**  
 [218] SEPTEMBER 17, 2020; OCTOBER 7, 2020

10/27/2020 **Order** **Doc ID# 214**  
 [214] Order Denying Motion to Consolidate

10/27/2020 **Order** **Doc ID# 215**  
 [215] Order Re Motion for Reconsideration

10/27/2020 **Notice of Entry of Order** **Doc ID# 216**  
 [216] Notice of Entry of Order

10/27/2020 **Notice of Entry of Order** **Doc ID# 217**  
 [217] Notice of Entry of Order

10/29/2020 **Transcript of Proceedings** **Doc ID# 219**  
 [219] SEPTEMBER 17, 2020

10/29/2020 **Transcript of Proceedings** **Doc ID# 220**  
 [220] OCTOBER 7, 2020

10/29/2020 **Certification of Transcripts Notification of Completion** **Doc ID# 306**  
 [306] SEPTEMBER 17, 2020; OCTOBER 7, 2020

10/29/2020 **Final Billing of Transcript** **Doc ID# 307**  
 [307] SEPTEMBER 17, 2020; OCTOBER 7, 2020

11/10/2020 **Motion to Reconsider** **Doc ID# 221**  
 [221] Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Order re Motion for Reconsideration entered on October 27, 2020

11/10/2020 **Notice of Hearing** **Doc ID# 222**

11/12/2020 [222] Notice of Hearing  
**Opposition Doc ID# 223**  
[223] Opposition to Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Order re Motion for Reconsideration entered on October 27, 2020; Counter-Petition for Removal of Rodney Gerald Yeoman From the Guardianship Proceedings; and Motion for Sanctions

12/08/2020 **Notice Doc ID# 224**  
[224] Notice of Intent to Appear by Communication Equipment

12/10/2020 **Stipulation and Order Doc ID# 225**  
[225] Stipulation and Order to Continue Hearing

12/10/2020 **Notice of Entry of Stipulation and Order Doc ID# 226**  
[226] Notice of Entry of Stipulation and Order

12/17/2020 **CANCELED Hearing (3:00 PM)** (Judicial Officer Marquis, Linda)  
Vacated - per Stipulation and Order  
Motion Pursuant to E.D.C.R. 2.24, N.R.C.P. 52.59 and 60 Regarding the Order Re Motion for Reconsideration entered on October 27, 2020

12/21/2020 **Accounting Doc ID# 227**  
[227] Accounting

12/30/2020 **Petition Doc ID# 228**  
[228] Verified Petition for Communication, Visits and Vacation Time with Protected Person - Unsigned

12/31/2020 **Clerk's Notice of Nonconforming Document Doc ID# 229**  
[229] Clerk's Notice of Nonconforming Document

12/31/2020 **Supplement Doc ID# 230**  
[230] Supplement to Verified Petition for Communication, Visits, and Vacation Time with the Protected Person

01/06/2021 **Notice of Hearing Doc ID# 231**  
[231] Notice of Hearing on Verified Petition for Communication, Visits and Vacation Time with Protected Person

01/06/2021 **Notice of Hearing Doc ID# 232**  
[232] Notice of Hearing

01/06/2021 **Certificate of Service Doc ID# 233**  
[233] Certificate of Service - Clerk's Notice of Hearing on Verified Petition for Communication, Visits and Vacation Time with Protected Person

01/08/2021 **Notice of Accounting Review Doc ID# 234**  
[234] Notice of Accounting Review

01/11/2021 **Notice Doc ID# 235**  
[235] Notice of Intent to Appear by Communication Equipment

01/12/2021 **Joinder Doc ID# 236**  
[236] Kathleen June Jones Joinder To Kimberly Jones Opposition To Motion Pursuant To E.D.C.R. 2.24, N.R.C.P. 52, 59, And 60, Regarding The Order Entered On October 27, 2020; Counter-Petition For Removal Of Rodney Gerald Yeoman From The Guardianship Proceedings; And Motion For Sanctions

01/14/2021 **Reply to Opposition Doc ID# 237**  
[237] Reply to Oppositions to Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Order re Motion for Reconsideration entered on October 27, 2020

01/21/2021 **Opposition & Counter Motion (9:30 AM)** (Judicial Officer Marquis, Linda)  
Opposition to Motion pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60, regarding the Order re Motion for Reconsideration entered on October 27, 2020; Counter-Petition for Removal of Rodney Gerald Yeoman From the Guardianship Proceedings; and Motion for Sanctions  
12/17/2020 Reset by Court to 01/21/2021  
Result: Granted in Part

01/21/2021 **Hearing (9:30 AM)** (Judicial Officer Marquis, Linda)  
Motion Pursuant to E.D.C.R. 2.24, N.R.C.P. 52.59 and 60 Regarding the Order Re Motion for Reconsideration entered on October 27, 2020  
Result: Denied

01/21/2021 **Hearing (9:30 AM)** (Judicial Officer Marquis, Linda)  
Reply to Oppositions to Motion Pursuant to E.D.C.R. 2.24, N.R.C.P. 52, 59 and 60 Regarding the Order re Motion for Reconsideration Entered on October 27, 2020  
Result: Matter Heard

01/21/2021 **All Pending Motions (9:30 AM)** (Judicial Officer Marquis, Linda)  
Parties Present  
Result: Matter Heard

01/25/2021 **Opposition Doc ID# 238**  
[238] Kathleen June Jones' Opposition to Verified Petition for Communication, Visits, and Vacation Time with Protected Person

01/25/2021 **Notice of Non Opposition Doc ID# 239**  
[239] Notice of Non-Opposition to Verified Petition for Communication, Visits and Vacation Time with Protected Person

01/25/2021 **Opposition Doc ID# 240**  
[240] Opposition to Verified Petition for Communication, Visits, and Vacation Time With Protected Person

02/01/2021 **Notice Doc ID# 241**  
[241] Notice of Intent to Appear by Communication Equipment

02/01/2021 **Reply to Opposition Doc ID# 242**  
[242] Petitioners' Omnibus Reply to Kimberly Jones' Opposition and to Kathleen Jones' Opposition to Verified Petition for Communication, Visits

02/03/2021 **Supplement Doc ID# 243**  
[243] Supplement to Petitioner's Omnibus Reply To: Kimberly Jones' Opposition to Verified Petition for Communication Visits ad to Kathleen June Jones Opposition to Verified Petition for Communication

02/03/2021 **Order Doc ID# 244**  
[244] Order re Motion Pursuant to EDCR 2.24, NRCP 52, 59 & 60, re the Order re Motion for Reconsideration

02/03/2021 **Notice of Entry of Order Doc ID# 245**  
[245] Notice of Entry of Order

02/06/2021 **Ex Parte Doc ID# 246**  
[246] Ex Parte Petition for An Order For the Attendance of The Protected Person at the February 11, 2021 Hearing

02/06/2021 **Affidavit in Support Doc ID# 247**  
[247] Affidavit In Support of Ex Parte Petition For An Order For the Attendance of the Protected Person at the February 11, 2021 Hearing

02/08/2021 **Petition Doc ID# 248**  
[248] Guardian of the Protected Person's Petition to Compromise Property of Protected Person and Seal Hearing

02/08/2021 **Order Shortening Time Doc ID# 249**  
[249] Order Shortening Time

02/08/2021 **Notice of Entry of Order Doc ID# 250**  
[250] Notice of Entry of Order Shortening Time and Notice of Hearing

02/11/2021 **Hearing (9:30 AM)** (Judicial Officer Marquis, Linda)  
Guardian of the Protected Person's Petition to Compromise Property of Protected Person and Seal Hearing  
Result: Granted in Part

02/11/2021 **All Pending Motions** (9:30 AM) (Judicial Officer Marquis, Linda)  
Parties Present  
 Result: Matter Heard

02/12/2021 **Hearing** (9:00 AM) (Judicial Officer Marquis, Linda)  
*SEALED HEARING - Approval of Settlement Agreement*  
Parties Present  
 Result: Matter Heard

02/12/2021 **Minute Order** (12:45 PM) (Judicial Officer Marquis, Linda)  
 Result: Minute Order - No Hearing Held

02/12/2021 **Order to Appoint State Investigator** **Doc ID# 251**  
*[251] Order to Appoint Investigator*

02/16/2021 **Order Appointing Guardian Ad Litem** **Doc ID# 252**  
*[252] Order Appointing Guardian ad Litem*

02/22/2021 **Notice** **Doc ID# 253**  
*[253] Notice of Intent to Appear by Communication Equipment*

02/22/2021 **Notice of Appearance** **Doc ID# 254**  
*[254] Notice of Appearance*

02/22/2021 **Notice** **Doc ID# 255**  
*[255] Notice of Intention to Seek Attorney's Fees and Costs from Guardianship Estate Pursuant to NRS 159.344(3)*

02/26/2021 **Notice** **Doc ID# 256**  
*[256] Kathleen June Jones' Notice of Objection to Guardian Ad Litem's Written Notice of Intention to Seek Attorney's Fees and Costs From Guardianship Estate Pursuant to NRS 159.344(3)*

03/01/2021 **Joinder** **Doc ID# 257**  
*[257] Kimberly Jones' Joinder to Kathleen June Jones Notice of Objection to Guardian Ad Litem s Written Notice of Intention to Seek Attorney s Fees and Costs from Guardianship Estate Pursuant to NRS 159.344(3)*

03/04/2021 **Status Check** (1:30 PM) (Judicial Officer Marquis, Linda)  
*SEALED HEARING: Review Settlement Agreement negotiations and placement of Protected Person.*  
Parties Present  
 Result: Matter Heard

03/08/2021 **Certificate of Service** **Doc ID# 258**  
*[258] Certificate of Service*

03/08/2021 **Notice** **Doc ID# 259**  
*[259] Notice of Intent to Appear by Communication Equipment*

03/09/2021 **Certificate of Service** **Doc ID# 260**  
*[260] Supplemental Certificate of Service*

03/09/2021 **Response** **Doc ID# 261**  
*[261] Response to Objection to Fees as Guardian ad Litem*

03/09/2021 **Ex Parte** **Doc ID# 262**  
*[262] Ex Parte Petition to Shorten To Hear Verified Petition for Communication, Visits and Vacation Time with the Protected Person*

03/09/2021 **Affidavit in Support** **Doc ID# 263**  
*[263] Affidavit in Support of Ex Parte Petition to Shorten Time to Hear Verified Petition*

03/10/2021 **Minute Order** (3:45 PM) (Judicial Officer Marquis, Linda)  
 Result: Minute Order - No Hearing Held

03/10/2021 **Joinder** **Doc ID# 264**  
*[264] Robyn Friedman and Donna Simmons' Joinder to Response to Objection to Fees as Guardian Ad Litem*

03/11/2021 **CANCELED Status Check** (2:00 PM) (Judicial Officer Marquis, Linda)  
*Vacated Placement*  
*03/18/2021 Reset by Court to 03/11/2021*

03/11/2021 **Minute Order** (1:45 PM) (Judicial Officer Marquis, Linda)  
 Result: Minute Order - No Hearing Held

03/12/2021 **Status Check** (2:00 PM) (Judicial Officer Marquis, Linda)  
*Protected Person's Placement*  
Parties Present  
 Result: Matter Heard

03/12/2021 **Petition** **Doc ID# 265**  
*[265] Petition for Payment of Guardian's Fee and Attorney Fees and Costs*

03/15/2021 **Order** **Doc ID# 266**  
*[266] Order Granting Petition to Compromise Property of Protected Person and Seal Hearing*

03/16/2021 **Notice** **Doc ID# 267**  
*[267] Notice of Intent to Appear by Communication Equipment*

03/16/2021 **Notice of Entry of Order** **Doc ID# 268**  
*[268] Notice of Entry of Order*

03/18/2021 **Memorandum** **Doc ID# 269**  
*[269] Kimberly Jones' Memorandum of Status*

03/19/2021 **Status Check** (1:00 PM) (Judicial Officer Marquis, Linda)  
Parties Present  
 Result: Matter Heard

03/24/2021 **Order Granting** **Doc ID# 270**  
*[270] Protective Order Authorizing Limited Review of Confidential Documents*

03/26/2021 **Petition** **Doc ID# 271**  
*[271] Petition to Relocate Protected Person and Transfer Guardianship*

03/26/2021 **Opposition** **Doc ID# 272**  
*[272] Opposition to Petition for Payment of Guardian's Fees and Attorney's Fees*

03/29/2021 **Reply** **Doc ID# 273**  
*[273] Kimberly Jones' Reply in Support of Petition for Payment of Guardian's Fees and Attorney Fees and Costs and Opposition to Request for Care Plan, Complete and Updated Inventory or Accounting, and Updated Budget*

03/29/2021 **Memorandum** **Doc ID# 274**  
*[274] Kimberly Jones' Memorandum of Status*

03/29/2021 **Report of the Guardian** **Doc ID# 275**  
*[275] Report to the Court*

03/30/2021 **Settlement Conference** (8:30 AM) (Judicial Officer Marquis, Linda)  
Parties Present  
 Result: Not Settled

03/30/2021 **Stricken Document** **Doc ID# 276**  
 [276] **\*\*STRICKEN DOCUMENT\*\* - Unsigned Order**

03/30/2021 **Clerk's Notice of Nonconforming Document** **Doc ID# 277**  
 [277] *Clerk's Notice of Nonconforming Document*

03/31/2021 **Ex Parte** **Doc ID# 278**  
 [278] *Ex-Parte Application for Order Shortening Time on Guardian Kimberly Jones' Petition to Relocate Protected Person and Transfer Guardianship*

04/02/2021 **Order** **Doc ID# 279**  
 [279] *Order Granting Ex-Parte Application for OST*

04/02/2021 **Notice of Entry of Order** **Doc ID# 280**  
 [280] *Notice of Entry of Order Shortening Time and Notice of Hearing*

04/05/2021 **Opposition** **Doc ID# 281**  
 [281] *Robyn Friedman and Donna Simmons' Opposition to Petition to Relocate the Protected Person and Transfer Guardianship*

04/06/2021 **Motion** (10:00 AM) (Judicial Officer Marquis, Linda)  
*Guardian Kimberly Jones' Petition to Relocate Protected Person and Transfer Guardianship*  
 Result: Denied in Part

04/06/2021 **Opposition** (10:00 AM) (Judicial Officer Marquis, Linda)  
*Robyn Friedman and Donna Simmons' Opposition to Petition to Relocate Protected Person and Transfer Guardianship*  
 Result: Granted in Part

04/06/2021 **All Pending Motions** (10:00 AM) (Judicial Officer Marquis, Linda)  
Parties Present  
 Result: Matter Heard

04/09/2021 **Order** **Doc ID# 282**  
 [282] *Order Granting Petition to Relocate Protected Person and Transfer Guardianship*

04/09/2021 **Notice of Entry of Order** **Doc ID# 283**  
 [283] *Notice of Entry of Order*

04/23/2021 **Petition** **Doc ID# 284**  
 [284] *Petition for Visitation with the Protected Person - Unsigned Verifications*

04/23/2021 **Ex Parte Petition** **Doc ID# 285**  
 [285] *Ex Parte Petition for Order Shortening Time to Hear Petition for Visitation*

04/26/2021 **Clerk's Notice of Nonconforming Document** **Doc ID# 286**  
 [286] *Clerk's Notice of Nonconforming Document*

04/26/2021 **Notice of Hearing** **Doc ID# 287**  
 [287] *Notice of Hearing on Petition for Visitation With the Protected Person*

04/26/2021 **Notice of Hearing** **Doc ID# 288**  
 [288] *Notice of Hearing*

04/26/2021 **Supplemental** **Doc ID# 289**  
 [289] *Supplement to Petition for Visitation with the Protected Person*

04/26/2021 **Certificate of Service** **Doc ID# 290**  
 [290] *Certificate of Service - Clerk's NOH, Petition for Visitation and Supplement to Petition for Visitation.*

04/26/2021 **Notice of Release of Lis Pendens** **Doc ID# 291**  
 [291] *Notice of Release of Lis Pendens*

05/03/2021 **Response** **Doc ID# 292**  
 [292] *Limited Response to Petition for Visitation with the Protected Person*

05/05/2021 **Stipulation and Order** **Doc ID# 293**  
 [293] *Stipulation and Order to Vacate Award of Attorney Fees and Costs*

05/05/2021 **Notice of Entry of Stipulation and Order** **Doc ID# 294**  
 [294] *Notice of Entry of Stipulation and Order*

05/05/2021 **Petition** **Doc ID# 295**  
 [295] *Petition to Approve Kathleen June Jones' Proposed Visitation Schedule*

05/05/2021 **Notice of Hearing** **Doc ID# 296**  
 [296] *Notice of Hearing*

05/05/2021 **Clerk's Notice of Hearing** **Doc ID# 297**  
 [297] *Clerk's Notice of Hearing*

05/05/2021 **Reply** **Doc ID# 298**  
 [298] *Reply to Limited Response to Petition for Visitation with the Protected Person*

05/06/2021 **Ex Parte Petition** **Doc ID# 299**  
 [299] *Ex Parte Motion for an Order Shortening Time for Hearing on Petition to Approve Kathleen June Jones' Proposed Visitation Schedule*

05/11/2021 **Ex Parte Application** **Doc ID# 300**  
 [300] *Ex Parte Application to Continue May 13, 2021 Hearing*

05/12/2021 **Minute Order** (2:45 PM) (Judicial Officer Marquis, Linda)  
 Result: Minute Order - No Hearing Held

05/13/2021 **CANCELED Hearing** (1:00 PM) (Judicial Officer Marquis, Linda)  
 Vacated  
*Verified Petition for Communication, Visits and Vacation Time with Protected Person (Continued from 2/11/21 for INVESTIGATOR'S REPORT)*  
 02/11/2021 Reset by Court to 05/13/2021

05/13/2021 **CANCELED Opposition** (1:00 PM) (Judicial Officer Marquis, Linda)  
 Vacated  
*Kathleen June Jones' Opposition to Verified Petition for Communication, Visits, and Vacation Time with Protected Person*  
 02/11/2021 Reset by Court to 05/13/2021

05/13/2021 **CANCELED Opposition** (1:00 PM) (Judicial Officer Marquis, Linda)  
 Vacated  
*Kimberly Jones' Opposition to Verified Petition for Communication, Visits, and Vacation Time with Protected Person*  
 02/11/2021 Reset by Court to 05/13/2021

05/13/2021 **CANCELED Hearing** (1:00 PM) (Judicial Officer Marquis, Linda)  
 Vacated  
*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.*

02/11/2021 *Reset by Court to 05/13/2021*

05/13/2021 **Order Shortening Time** **Doc ID# 301**  
[301] Jones OST

05/13/2021 **Order Shortening Time** **Doc ID# 302**  
[302] Order Shortening Time

05/17/2021 **Request** **Doc ID# 303**  
[303] Request for Hearing

05/17/2021 **Notice of Hearing** **Doc ID# 304**  
[304] Notice of Hearing

05/17/2021 **Certificate of Service** **Doc ID# 305**  
[305] Certificate of Service

05/25/2021 **Certificate of Service** **Doc ID# 310**  
[310] Certificate of Service

05/27/2021 **CANCELED Hearing** (2:30 PM) (Judicial Officer Marquis, Linda)  
Vacated  
Notice of Hearing on Petition to Approve Kathleen June Jones' Proposed Visitation Schedule

05/27/2021 **Estimate of Transcript** **Doc ID# 311**  
[311] FEBRUARY 11, 2021

06/01/2021 **Pre-trial Memorandum** **Doc ID# 312**  
[312] Robyn Friedman s and Donna Simmons Pre-Trial Memorandum Regarding Communication and Visits, and Exhibit List

06/02/2021 **Motion to Stay** **Doc ID# 313**  
[313] Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ of Mandamus

06/02/2021 **Notice of Hearing** **Doc ID# 314**  
[314] Notice of Hearing

06/02/2021 **Joinder** **Doc ID# 315**  
[315] Kimberly Jones' Partial Joinder to Kathleen June Jones' Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ of Mandamus

06/03/2021 **CANCELED Status Check** (1:00 PM) (Judicial Officer Marquis, Linda)  
Vacated  
To determine if case should remain sealed

06/03/2021 **CANCELED Hearing** (1:30 PM) (Judicial Officer Marquis, Linda)  
Vacated  
Petition for Visitation with the Protected Person

06/03/2021 **Exhibits** **Doc ID# 316**  
[316] Exhibit to Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ of Mandamus

06/03/2021 **Request** **Doc ID# 317**  
[317] Request for Transcript of Proceedings

06/03/2021 **Notice of Hearing** **Doc ID# 318**  
[318] Notice of Hearing

06/03/2021 **Ex Parte Petition** **Doc ID# 319**  
[319] Ex Parte Motion for an Order Shortening Time on Hearing on Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ of Mandamus

06/03/2021 **Notice** **Doc ID# 320**  
[320] Notice of Filing

06/03/2021 **Budget** **Doc ID# 321**  
[321] Anticipated and Proposed Budget

06/03/2021 **Care Plan** **Doc ID# 322**  
[322] Plan of Care for Protected Person Kathleen June Jones

06/03/2021 **Accounting** **Doc ID# 323**  
[323] Amended First Accounting

06/03/2021 **Request** **Doc ID# 324**  
[324] Request for Hearing

06/03/2021 **Opposition** **Doc ID# 325**  
[325] Robyn Friedman and Donna Simmons Omnibus Opposition to Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ of Mandamus; and Kimberly Jones Partial Joinder to Kathleen June Jones Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ of Mandamus

06/04/2021 **Transcript of Proceedings** **Doc ID# 334**  
[334] FEBRUARY 11, 2021

06/07/2021 **Motion in Limine** **Doc ID# 326**  
[326] Robyn Friedman and Donna Simmons' Motion in Limine to Preclude Untimely Disclosures at the Evidentiary Hearing

06/07/2021 **Pre-trial Memorandum** **Doc ID# 327**  
[327] Kimberly Jones' Pretrial Memorandum

06/07/2021 **Pre-trial Memorandum** **Doc ID# 328**  
[328] Kathleen June Jones' Pretrial Memorandum

06/07/2021 **Notice of Accounting Review** **Doc ID# 329**  
[329] Notice of Accounting Review

06/07/2021 **Confidential Report of AOC Investigator** **Doc ID# 330**  
[330] Confidential Report of AOC Investigator

06/07/2021 **Order** **Doc ID# 331**  
[331] G-19-052263-A Kathleen Jones ORDR

06/07/2021 **Clerk's Notice of Nonconforming Document** **Doc ID# 332**  
[332] Clerk's Notice of Nonconforming Document

06/07/2021 **Opposition** **Doc ID# 333**  
[333] Partial Opposition to Declaration of Investigation

06/08/2021 **Evidentiary Hearing** (9:00 AM) (Judicial Officer Marquis, Linda)  
Visitation, Proposed Visitation Schedule, and Oppositions  
Parties Present  
Result: Decision Made

06/15/2021 **Pre-trial Memorandum** **Doc ID# 335**  
[335] Supplement to Robyn Friedman s and Donna Simmons Pre-Trial Memorandum Regarding Communication and Visits, and Exhibit List

06/16/2021 **Supplement** **Doc ID# 336**  
[336] Kimberly Jones' Supplement to Petition for Payment of Guardian's Fee & Attorney Fees and Costs

06/16/2021 **Notice of Hearing** **Doc ID# 337**

[337] Notice of Hearing on First Amended Accounting  
06/16/2021 **Notice of Hearing Doc ID# 338**  
[338] Notice of Hearing

06/17/2021 **Hearing (1:30 PM)** (Judicial Officer Steel, Cynthia Dianne)  
*Petition for Payment of Guardians' Fee and Attorney Fees and Costs Filed March 12, 2021*  
Parties Present  
Result: Matter Continued

06/17/2021 **Certificate of Mailing Doc ID# 339**  
[339] Certificate of Mailing of Clerk's Notice of Hearing on Amended First Accounting

06/18/2021 **Brief Doc ID# 340**  
[340] Robyn Friedman's and Donna Simmons' Closing Argument Brief

06/18/2021 **Brief Doc ID# 341**  
[341] Kimberly Jones' Closing Brief Following Evidentiary Hearing

06/18/2021 **Findings of Fact, Conclusions of Law and Judgment Doc ID# 343**  
[343] Kathleen June Jones' Closing Argument and Proposed Findings of Fact and Conclusions of Law

06/24/2021 **Findings of Fact, Conclusions of Law and Judgment Doc ID# 342**  
[342] Kathleen June Jones' Closing Argument and Proposed Findings of Fact and Conclusions of Law

07/08/2021 **CANCELED Motion to Stay (9:30 AM)** (Judicial Officer Marquis, Linda)  
Vacated - per Judge  
*Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ of Mandamus*

07/08/2021 **CANCELED Opposition (9:30 AM)** (Judicial Officer Marquis, Linda)  
Vacated - per Judge  
*Robyn Friedman and Donna Simmons' Omnibus Opposition to Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ Mandamus; and Kimberly Jones' Partial Joinder to Kathleen June Jones' Motion to Stay Evidentiary Hearing Pending Petition for Writ of Prohibition and Petition for Writ Mandamus*

07/13/2021 **Stipulation and Order Doc ID# 344**  
[344] Stipulation and Order to Continue Hearings

07/14/2021 **Notice of Entry of Order Doc ID# 345**  
[345] Notice of Entry of Stipulation and Order to Continue Hearings

07/15/2021 **Objection Doc ID# 346**  
[346] Robyn Friedman's and Donna Simmons' Objection to Guardian's Accounting and First Amended Accounting

07/15/2021 **Petition Doc ID# 347**  
[347] Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advanced to the Guardianship Estate

07/15/2021 **Notice of Hearing Doc ID# 348**  
[348] Notice of Hearing on Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advances to the Guardianship Estate

07/19/2021 **Notice of Hearing Doc ID# 349**  
[349] Notice of Hearing

07/21/2021 **Certificate of Service Doc ID# 350**  
[350] Certificate of Service - Clerk's Notice of Hearing & Petition for Reimbursement of Temporary Guardian's Costs and Legal Fees and Costs Advanced to the Guardianship Estate

07/21/2021 **Minute Order (12:45 PM)** (Judicial Officer Marquis, Linda)  
Result: Minute Order - No Hearing Held

07/26/2021 **Response Doc ID# 351**  
[351] Response to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advanced to the Guardianship Estate

07/26/2021 **Objection Doc ID# 352**  
[352] Kimberly Jones' Objection to Robyn Friedman's and Donna Simmons' Objection to Guardian's Accounting and First Amended Accounting

07/26/2021 **Ex Parte Application Doc ID# 353**  
[353] Ex Parte Petition to Redact Social Security Number

07/27/2021 **Ex Parte Order Doc ID# 354**  
[354] Order Granting Petition to Redact Social Security Number 1

07/28/2021 **Notice of Entry of Order Doc ID# 355**  
[355] Notice of Entry of Order Granting Ex Parte Petition to Redact Social Security Number

07/30/2021 **Objection Doc ID# 356**  
[356] Objection to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advanced to the Guardianship Estate

08/03/2021 **NV Supreme Court Clerks Certificate/Judgment - Dismissed Doc ID# 357**  
[357] Nevada Supreme Court Clerk's Certificate/Remittitur Judgment - Dismissed

08/09/2021 **Memorandum Doc ID# 358**  
[358] Kimberly Jones' Memorandum of Status Dated August 6, 2021

08/09/2021 **Supplement Doc ID# 359**  
[359] Second Amendment to First Accounting

08/09/2021 **Response Doc ID# 360**  
[360] Robyn Friedman and Donna Simmons' Response to Guardian's Objection to Objection to Guardian's Accounting and First Amended Accounting

08/12/2021 **CANCELED Status Check (9:00 AM)** (Judicial Officer Marquis, Linda)  
Vacated - per Secretary  
*Court's decision from Evidentiary Hearing held 6/8/21*  
07/21/2021 Reset by Court to 08/12/2021

08/12/2021 **Hearing (9:00 AM)** (Judicial Officer Marquis, Linda)  
*Amended First Accounting*  
07/15/2021 Reset by Court to 08/12/2021  
Result: Matter Heard

08/12/2021 **Hearing (9:00 AM)** (Judicial Officer Marquis, Linda)  
*Petition for Payment of Guardians' Fee and Attorney Fees and Costs filed March 12, 2021 (cont from 6/17/21 per Judge Steel)*  
07/15/2021 Reset by Court to 08/12/2021  
Result: Matter Heard

08/12/2021 **Status Check (9:00 AM)** (Judicial Officer Marquis, Linda)  
07/21/2021 Reset by Court to 08/12/2021  
Result: Matter Heard

08/12/2021 **Objection (9:00 AM)** (Judicial Officer Marquis, Linda)  
*Robyn Friedman and Donna Simmons Objection to Guardians Accounting and First Amended Accounting*

Result: Matter Heard  
 08/12/2021 **Objection** (9:00 AM) (Judicial Officer Marquis, Linda)  
*Kimberly Jones' Objection to Robyn Friedman's and Donna Simmons' Objection to Guardians Accounting and First Amended Accounting*  
 Result: Matter Heard  
 08/12/2021 **All Pending Motions** (9:00 AM) (Judicial Officer Marquis, Linda)  
Parties Present  
 Result: Matter Heard  
 08/16/2021 **Reply Doc ID# 361**  
*[361] Petitioners' Omnibus Reply to Kimberly Jones Response to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advanced*  
 08/16/2021 **Stipulation and Order Doc ID# 362**  
*[362] Stipulation and Order for Modification of Order Compromising Property of Protected Person*  
 08/17/2021 **Notice of Entry of Stipulation and Order Doc ID# 363**  
*[363] Notice of Entry of Stipulation and Order*  
 08/19/2021 **Hearing** (1:30 PM) (Judicial Officer Marquis, Linda)  
*Petition for Reimbursement of Temporary Guardians Costs and Legal Fees and Costs Advanced to the Guardianship Estate*  
 Result: Decision Made  
 08/19/2021 **Hearing** (1:30 PM) (Judicial Officer Marquis, Linda)  
*Response to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advanced to the Guardianship Estate*  
 Result: Decision Made  
 08/19/2021 **Objection** (1:30 PM) (Judicial Officer Marquis, Linda)  
*Objection to Petition for Reimbursement of Temporary Guardian Costs and Legal Fees and Costs Advanced to the Guardianship Estate*  
 Result: Decision Made  
 08/19/2021 **Hearing** (1:30 PM) (Judicial Officer Marquis, Linda)  
*Petitioners' Omnibus Reply to Kimberly Jones' Response to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advanced to the Guardianship Estate and Kathleen June Jones' Objection to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees and Costs Advanced to the Guardianship Estate*  
 Result: Decision Made  
 08/19/2021 **All Pending Motions** (1:30 PM) (Judicial Officer Marquis, Linda)  
Parties Present  
 Result: Matter Heard  
 08/19/2021 **Supplemental Doc ID# 364**  
*[364] Supplement to Petitioners' Omnibus Reply to Kimberly Jones' Response to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees*  
 08/25/2021 **Supplement Doc ID# 365**  
*[365] Second Supplement to Petitioners' Omnibus Reply to Kimberly Jones' Response to Petition For Reimbursement of Temporary Guardians' Costs and Legal Fees*  
 08/30/2021 **Response Doc ID# 366**  
*[366] Response to Friedman's and Simmons' Second Supplement to Petitioners' Omnibus Reply to Kimberly Jones' Response to Petition for Reimbursement of Temporary Guardians' Costs and Legal Fees*  
 09/02/2021 **Order Doc ID# 367**  
*[367] Order Pursuant to NRS159.179*  
 09/07/2021 **Estimate of Transcript Doc ID# 368**  
*[368] JUNE 08, 2021*  
 09/15/2021 **CANCELED Decision** (5:00 AM) (Judicial Officer Marquis, Linda)  
*Vacated*  
 09/16/2021 **Production of Documents Doc ID# 369**  
*[369] Receipts and/or Vouchers in Support of First Accounting*  
 09/16/2021 **Memorandum Doc ID# 370**  
*[370] Kimberly Jones' Memorandum of Status Dated 9-16-21*  
 09/29/2021 **Order Doc ID# 371**  
*[371] Order Referring to Compliance Division for Additional Accounting Review*  
 10/27/2021 **Petition Doc ID# 372**  
*[372] Petition for Approval of Guardian Ad Litem's Fees and Costs*  
 10/27/2021 **Notice of Hearing Doc ID# 373**  
*[373] Notice of Hearing*  
 10/28/2021 **Clerk's Notice of Hearing Doc ID# 374**  
*[374] Clerk's Notice of Hearing*  
 11/16/2021 **Notice of Accounting Review Doc ID# 375**  
*[375] Notice of Accounting Review 9/16/2021 Supplement*  
 11/18/2021 **Objection Doc ID# 376**  
*[376] Objection to Petition for Approval of Guardian Ad Litem's Fees and Costs*  
 12/02/2021 **Notice of Accounting Review Doc ID# 377**  
*[377] Amended Notice of Accounting Review*  
 12/06/2021 **Findings of Fact, Conclusions of Law and Judgment Doc ID# 378**  
*[378] Findings of Fact Conclusions of Law and Order Regarding Visitation, First Annual Accounting, Guardian's Fees, Caretaking Fees, Attorney's Fees and Costs, and Removal of the Guardian*  
 12/07/2021 **Notice of Change of Firm Name Doc ID# 379**  
*[379] Notice of Change of Firm Name and Address*  
 12/07/2021 **Order to Appoint State Investigator Doc ID# 380**  
*[380] Order Appointing Investigator*  
 12/07/2021 **Order Appointing General Guardian - Person & Estate Doc ID# 381**  
*[381] Order Appointing Successor Guardian*  
 12/07/2021 **Guardian's Acknowledgment of Duties Doc ID# 382**  
*[382] Guardian's Acknowledgment of Duties and Responsibilities*  
 12/07/2021 **Letters of General Guardianship Doc ID# 383**  
*[383] Letters of General Guardianship*  
 12/08/2021 **Notice of Entry of Order Doc ID# 384**  
*[384] Notice of Entry of Order Appointing Successor Guardian*  
 12/09/2021 **Hearing** (11:00 AM) (Judicial Officer Marquis, Linda)  
*Notice of Hearing on Petition for Approval of Guardian Ad Litem's Fees and Costs*  
Parties Present

Result: Approved and Granted

12/10/2021 **Motion for Withdrawal** Doc ID# 385  
[385] Motion to Withdraw as Counsel of Record

12/10/2021 **Notice of Hearing** Doc ID# 386  
[386] Notice of Hearing

12/10/2021 **Notice of Entry of Order** Doc ID# 387  
[387] Notice of Entry of Order

12/13/2021 **Notice of Entry of Order** Doc ID# 388  
[388] Notice of Entry of Order

12/15/2021 **Notice of Appeal** Doc ID# 389  
[389] Notice of Appeal

12/15/2021 **Case Appeal Statement** Doc ID# 390  
[390] Case Appeal Statement

12/15/2021 **Petition** Doc ID# 391  
[391] Petition to Compel Kimberly Jones to Provide Any and All Information and Documentation Related to the Protected Person to the Successor Guardian

12/15/2021 **Notice of Hearing** Doc ID# 392  
[392] Notice of Hearing on Petition to Compel Kimberly Jones to Provide Any and All Information and Documentation Related to the Protected Person to the Successor Guardian

12/15/2021 **Petition** Doc ID# 393  
[393] Petition to Relocate the Protected Person to Nevada

12/15/2021 **Notice of Hearing** Doc ID# 394  
[394] Notice of Hearing on Petition to Relocate the Protected Person to Nevada

12/15/2021 **Notice of Hearing** Doc ID# 395  
[395] Notice of Hearing

12/15/2021 **Notice of Hearing** Doc ID# 396  
[396] Notice of Hearing

12/15/2021 **Ex Parte Petition** Doc ID# 397  
[397] Ex Parte Petition for an Order Shortening Time to Hear Petition for Authority to Relocate the Protected Person to Nevada and to Hear Petition to Compel Kimberly Jones to Provide any and all Information and Documentation Related to the Protected Person to the Successor Guardian

12/15/2021 **Affidavit of Due Diligence** Doc ID# 398  
[398] Affidavit in Support of Ex Parte Petition for an Order Shortening Time to Hear Petition for Authority to Relocate the Protected Person to Nevada and to Hear Petition to Compel Kimberly Jones to Provide any and all Information and Documentation Related to the Protected Person to the Successor Guardian

12/16/2021 **Order** Doc ID# 399  
[399] Order Granting Ex Parte OST

12/16/2021 **Notice of Non-Compliance** Doc ID# 400  
[400] G-19-052263-A NNC Kathleen Jones

12/17/2021 **Notice of Entry of Order** Doc ID# 401  
[401] Notice of Entry of Order

12/17/2021 **Notice** Doc ID# 402  
[402] Notice of Intent to Seek Payment of Fees and Costs

12/17/2021 **Estimate of Transcript** Doc ID# 403  
[403] June 08, 2021

12/20/2021 **Hearing** (9:00 AM) (Judicial Officer Marquis, Linda)  
Hearing on Petition to Compel Kimberly Jones to provide any and all information and documentation related to the Protected Person to the Successor Guardian  
Result: Matter Heard

12/20/2021 **Hearing** (9:00 AM) (Judicial Officer Marquis, Linda)  
Petition to Relocate the Protected Person to Nevada  
Result: Matter Continued

12/20/2021 **All Pending Motions** (9:00 AM) (Judicial Officer Marquis, Linda)  
Parties Present  
Result: Matter Heard

12/21/2021 **Order** Doc ID# 404  
[404] Order from December 20, 2021 Hearing

12/21/2021 **Notice of Entry of Order** Doc ID# 405  
[405] NOTICE OF ENTRY OF ORDER

12/22/2021 **Motion to Stay** Doc ID# 406  
[406] 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

12/22/2021 **Notice of Hearing** Doc ID# 407  
[407] Notice of Hearing

12/22/2021 **Notice of Hearing** Doc ID# 408  
[408] Notice of Hearing

12/22/2021 **Ex Parte Petition** Doc ID# 409  
[409] Ex Parte Motion for an Order Shortening Time for Hearing on Motion to Stay

12/23/2021 **Opposition** Doc ID# 410  
[410] Opposition to Ex Parte Motion for An Order Shortening Time for Hearing on Motion to Stay

01/04/2022 **Physicians Certificate** Doc ID# 411  
[411] Confidential Medical Documents

01/04/2022 **Certificate of Service** Doc ID# 412  
[412] Certificate of Service

01/05/2022 **Opposition** Doc ID# 413  
[413] Opposition to Motion to Stay Order for Removal of Guardian and Order Appointing Successor General Guardian of the Person and Estate

01/07/2022 **Inventory, Appraisal and/or Record of Value** Doc ID# 414  
[414] Inventory, Appraisal, Oath and Verified Record of Value

01/07/2022 **Care Plan** Doc ID# 415  
[415] Care Plan if Kathleen June Jones Lives in Nevada; and, in the alternative, Care Plan if Kathleen June Jones Lives in California

01/07/2022 **Budget** Doc ID# 416  
[416] Proposed Nevada Monthly Budget if Protected Person Lives in Nevada and the Anaheim Property is Sold; and in the Alternative, Proposed Nevada Monthly Budget if Protected Person Lives in Nevada and the Anaheim Property is Rented; and in the Alternative, Proposed California



	<i>Monthly Budget if Protected Person Lives in California in the Anaheim Property</i>
01/08/2022	<b>Supplement Doc ID# 417</b> [417] <i>Supplement to Petition to Relocate the Protected Person to Nevada</i>
01/11/2022	<b>Request Transcript of Proceedings Doc ID# 418</b> [418] <i>Request for Transcript of Proceedings</i>
01/11/2022	<b>Petition and Request for Enforcement Doc ID# 419</b> [419] <i>PETITION FOR AN ORDER TO ENFORCE AND/OR FOR AN ORDER TO SHOW CAUSE REGARDING CONTEMPT; PETITION FOR ATTORNEYS FEES</i>
01/12/2022	<b>Hearing (9:00 AM) (Judicial Officer Marquis, Linda)</b> <i>Petition to Relocate the Protected Person to Nevada</i> <u>Parties Present</u> Result: Approved and Granted
01/12/2022	<b>Petition Doc ID# 420</b> [420] <i>Petition to Restrict Visitation, Communication and Interaction with the Protected Person Kathleen June Jones</i>
01/12/2022	<b>Findings of Fact, Conclusions of Law and Judgment Doc ID# 421</b> [421] <i>Findings of Fact, Conclusions of Law, and Order Granting Successor Guardian's Motion to Relocate</i>
01/12/2022	<b>Notice of Non Opposition Doc ID# 422</b> [422] <i>Notice of Non-Opposition</i>
01/13/2022	<b>Order Doc ID# 423</b> [423] <i>Order Granting Motion to Withdraw as Counsel of Record - In the Matter of the Guardianship of the Person and Estate of Kathleen June Jones</i>
01/13/2022	<b>Notice of Entry of Order Doc ID# 424</b> [424] <i>Notice of Entry of Order Granting Motion to Withdraw as Counsel</i>
01/14/2022	<b>Minute Order (8:00 AM) (Judicial Officer Marquis, Linda)</b> Result: Minute Order - No Hearing Held
01/14/2022	<b>Minute Order (8:00 AM) (Judicial Officer Marquis, Linda)</b> Result: Minute Order - No Hearing Held
01/19/2022	<b>CANCELED Motion for Withdrawal (5:00 AM) (Judicial Officer Marquis, Linda)</b> <i>Vacated</i> <i>Motion for Withdrawal as Counsel of Record</i>
01/25/2022	<b>Stipulation and Order Doc ID# 425</b> [425] <i>Stipulation and Order to Move Settlement Funds to Michaelson Law IOLTA then Guardianship Account</i>
01/26/2022	<b>Notice of Entry of Order Doc ID# 426</b> [426] <i>Notice of Entry of Order</i>
01/26/2022	<b>Notice Doc ID# 427</b> [427] <i>Notice of Move of Proposed Protected Person</i>
01/26/2022	<b>Response Doc ID# 428</b> [428] <i>Response to compel</i>
01/26/2022	<b>Response Doc ID# 429</b> [429] <i>Response to findings of facts and conclusions of law and order regarding visitation</i>
01/26/2022	<b>Response Doc ID# 430</b> [430] <i>Response to petition to restrict visitation, communication and interaction with protected person</i>
01/26/2022	<b>Supplement Doc ID# 431</b> [431] <i>Supplement to Petition to Restrict Visitation, Communication and Interaction with the Protected Person Kathleen June Jones</i>
01/27/2022	<b>CANCELED Hearing (11:30 AM) (Judicial Officer Marquis, Linda)</b> <i>Vacated - per OST</i> <i>Hearing on Petition to Compel Kimberly Jones to provide any and all information and documentation related to the Protected Person to the Successor Guardian</i>
01/27/2022	<b>CANCELED Hearing (11:30 AM) (Judicial Officer Marquis, Linda)</b> <i>Vacated - per OST</i> <i>Petition to Relocate the Protected Person to Nevada</i>
01/27/2022	<b>Hearing (1:30 PM) (Judicial Officer Marquis, Linda)</b> <i>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</i> <u>Parties Present</u> Result: Denied
02/08/2022	<b>Notice of Hearing Doc ID# 432</b> [432] <i>Notice of Hearing on Petition for an Order to Enforce and/or for an Order to Show Cause Regarding Contempt; Petition for Attorneys Fees</i>
02/08/2022	<b>Notice of Hearing Doc ID# 433</b> [433] <i>Notice of Hearing on Petition to Restrict Visitation, Communication and Interaction with the Protected Person Kathleen June Jones</i>
02/09/2022	<b>Notice of Hearing Doc ID# 434</b> [434] <i>Notice of Hearing</i>
02/09/2022	<b>Notice of Hearing Doc ID# 435</b> [435] <i>Notice of Hearing</i>
02/09/2022	<b>Certificate of Service Doc ID# 436</b> [436] <i>Certificate of Service</i>
02/09/2022	<b>Certificate of Service Doc ID# 437</b> [437] <i>Certificate of Service</i>
02/23/2022	<b>Proof Doc ID# 438</b> [438] <i>Proof of Blocked Account(s)</i>
02/24/2022	<b>Affidavit of Service Doc ID# 439</b> [439] <i>Affidavit of Service</i>
03/03/2022	<b>Petition Doc ID# 440</b> [440] <i>Petition for Advice and Instructions Concerning Using Funds to Pay for Legal Services in California and Petition to Use Funds to Repair Anaheim Property</i>
03/03/2022	<b>Notice of Hearing Doc ID# 441</b> [441] <i>Notice of Hearing On Petition for Advice and Instructions Concerning Using Funds to Pay for Legal Services in California and Petition to Use Funds to Repair Anaheim Property</i>
03/03/2022	<b>Reply Doc ID# 442</b> [442] <i>Reply to Kimberly Jones Response to Petition to Restrict Visitation, Communication and Interaction with Protected Person Kathleen June Jones</i>
03/03/2022	<b>Reply Doc ID# 443</b>

	<i>[443] Reply to Kimberly Jones Response to Findings of Facts and Conclusions of Law and Order Regarding Visitation, First Annual Accounting, Guardian s Fees, Caretaking Fees, Attorney Fees and Cost and Removal of the Guardian</i>
03/03/2022	<b>Reply Doc ID# 444</b> <i>[444] Reply to Kimberly Jones Response to Petition to Compel Kimberly Jones to Provide Any and All Information and Documentation Related to the Protected Person to the Successor Guardian</i>
03/03/2022	<b>Affidavit of Service Doc ID# 445</b> <i>[445] Affidavit of Personal Service</i>
03/04/2022	<b>Notice of Hearing Doc ID# 446</b> <i>[446] Notice of Hearing</i>
03/04/2022	<b>Certificate of Service Doc ID# 447</b> <i>[447] Certificate of Service</i>
03/04/2022	<b>Ex Parte Petition Doc ID# 448</b> <i>[448] EX PARTE PETITION FOR AN ORDER SHORTENING TIME TO HEAR PETITION FOR ADVICE AND INSTRUCTIONS CONCERNING USING FUNDS TO PAY FOR LEGAL SERVICES IN CALIFORNIA AND PETITION TO USE FUNDS TO REPAIR ANAHEIM PROPERTY</i>
03/04/2022	<b>Affidavit of Due Diligence Doc ID# 449</b> <i>[449] AFFIDAVIT IN SUPPORT OF EX PARTE PETITION FOR AN ORDER SHORTENING TIME TO HEAR PETITION FOR ADVICE AND INSTRUCTIONS CONCERNING USING FUNDS TO PAY FOR LEGAL SERVICES IN CALIFORNIA AND PETITION TO USE FUNDS TO REPAIR ANAHEIM PROPERTY</i>
03/08/2022	<b>Motion for Extension of Time to Prepare Transcripts Doc ID# 450</b> <i>[450] June 08, 2021 and January 27, 2022</i>
03/10/2022	<b>Hearing (1:00 PM) (Judicial Officer Marquis, Linda)</b> <i>Petition for an Order to Enforce and/or for an Order to Show Cause regarding Contempt; Petition for Attorneys Fees</i> Result: Granted
03/10/2022	<b>Hearing (1:00 PM) (Judicial Officer Marquis, Linda)</b> <i>Petition to Restrict Visitation, Communication and Interaction with the Protected Person Kathleen June Jones</i> Result: Matter Heard
03/10/2022	<b>All Pending Motions (1:00 PM) (Judicial Officer Marquis, Linda)</b> <u>Parties Present</u> Result: Matter Heard
03/11/2022	<b>Order Shortening Time Doc ID# 451</b> <i>[451] Order Granting Order Shortening Time</i>
03/11/2022	<b>Notice of Entry Doc ID# 452</b> <i>[452] Notice of Entry of Order Granting Ex Parte Petition for An Order Shortening Time to Hear Petition for Advice and Instructions</i>
03/14/2022	<b>Notice of Non Opposition Doc ID# 453</b> <i>[453] Notice of Non-Opposition</i>
03/17/2022	<b>Hearing (2:30 PM) (Judicial Officer Marquis, Linda)</b> <i>Perition For Advice And Instructions Concerning Using Funds To Pay For Legal Service In California And Petition To Use Funds to Repair Anaheim Property</i> <i>03/31/2022 Reset by Court to 03/17/2022</i> Result: Granted
03/17/2022	<b>Petition for Instructions (2:30 PM) (Judicial Officer Marquis, Linda)</b> <i>Order Shortening Time - Petition For Advice And Instructions Concerning Using Funds To Pay For Legal Service In California And Petition To Use Funds to Repair Anaheim Property</i> Result: Granted
03/17/2022	<b>All Pending Motions (2:30 PM) (Judicial Officer Marquis, Linda)</b> <u>Parties Present</u> Result: Matter Heard
03/18/2022	<b>Findings of Fact, Conclusions of Law and Judgment Doc ID# 454</b> <i>[454] Findings of Fact Conclusions of Law and Order Granting GAL Fees</i>
03/23/2022	<b>NV Supreme Court Clerks Certificate/Judgment - Affirmed Doc ID# 455</b> <i>[455] Nevada Supreme Court Clerk's Certificate/Remittitur Judgment - Affirmed</i>
03/25/2022	<b>Certification of Transcripts Notification of Completion Doc ID# 456</b> <i>[456] January 27, 2022</i>
03/25/2022	<b>Transcript of Proceedings Doc ID# 457</b> <i>[457] January 27, 2022</i>
03/25/2022	<b>Transcript of Proceedings Doc ID# 458</b> <i>[458] June 08, 2021</i>
03/25/2022	<b>Certification of Transcripts Notification of Completion Doc ID# 459</b> <i>[459] June 08, 2022</i>
03/25/2022	<b>Receipt of Copy Doc ID# 463</b> <i>[463] January 27, 2022</i>
03/25/2022	<b>Final Billing of Transcript Doc ID# 464</b> <i>[464] January 27, 2022</i>
03/25/2022	<b>Receipt of Copy Doc ID# 465</b> <i>[465] June 08, 2021</i>
03/25/2022	<b>Final Billing of Transcript Doc ID# 466</b> <i>[466] June 08, 2021</i>
03/30/2022	<b>Order Doc ID# 460</b> <i>[460] Order on Petition Regarding Instructions Hire Counsel in California Use Funds Repair Anaheim Property</i>
03/30/2022	<b>Notice of Entry Doc ID# 461</b> <i>[461] Notice of Entry of Order</i>
03/31/2022	<b>Notice of Entry Doc ID# 462</b> <i>[462] Notice of Entry of Order</i>
04/28/2022	<b>Notice of Appearance Doc ID# 467</b> <i>[467] Notice of Appearance</i>
04/28/2022	<b>Notice of Appeal Doc ID# 468</b> <i>[468] Notice of Appeal</i>
04/28/2022	<b>Case Appeal Statement Doc ID# 469</b> <i>[469] Case Appeal Statement</i>
05/02/2022	<b>Statement of Legal Aid Representation and Fee Waiver Doc ID# 470</b> <i>[470] Statement of Legal Aid Representation and Fee Waiver</i>
05/09/2022	<b>Report and Recommendations Doc ID# 471</b>

	[471] Confidential Financial Forensic Report on behalf of Kathleen Jones	
05/09/2022	<b>Exhibits</b>	<b>Doc ID# 472</b>
	[472] Confidential Financial Forensic Report Kathleen Jones Exhibit A	
05/09/2022	<b>Exhibits</b>	<b>Doc ID# 473</b>
	[473] Confidential Financial Forensic Report Kathleen Jones Exhibit B	
05/09/2022	<b>Exhibits</b>	<b>Doc ID# 474</b>
	[474] Confidential Financial Forensic Report Kathleen Jones Exhibit C	
05/09/2022	<b>Exhibits</b>	<b>Doc ID# 475</b>
	[475] Confidential Financial Forensic Report Kathleen Jones Exhibit D	
05/12/2022	<b>Request Transcript of Proceedings</b>	<b>Doc ID# 476</b>
	[476] Request For Transcript Of Proceedings	
05/12/2022	<b>Estimate of Transcript</b>	<b>Doc ID# 477</b>
	[477] April 06, 2021; December 09, 2021	
05/20/2022	<b>Estimate of Transcript</b>	<b>Doc ID# 478</b>
	[478] August 12, 2021	
05/20/2022	<b>Estimate of Transcript</b>	<b>Doc ID# 479</b>
	[479] MARCH 12, 2021	
06/07/2022	<b>Notice</b>	<b>Doc ID# 480</b>
	[480] Notice of Planned Response to Confidential Financial Forensic Report on Behalf of Kathleen Jones	
06/07/2022	<b>Estimate of Transcript</b>	<b>Doc ID# 481</b>
	[481] March 12, 2021; August 12, 2021	
06/13/2022	<b>Transcript of Proceedings</b>	<b>Doc ID# 483</b>
	[483] March 12, 2021	
06/13/2022	<b>Transcript of Proceedings</b>	<b>Doc ID# 484</b>
	[484] August 12, 2021	
06/13/2022	<b>Certification of Transcripts Notification of Completion</b>	<b>Doc ID# 510</b>
	[510] March 12, 2021; August 12, 2021	
06/14/2022	<b>Certification of Transcripts Notification of Completion</b>	<b>Doc ID# 482</b>
	[482] March 12, 2021; August 12, 2021	
06/14/2022	<b>Transcript of Proceedings</b>	<b>Doc ID# 485</b>
	[485] April 06, 2021	
06/14/2022	<b>Transcript of Proceedings</b>	<b>Doc ID# 486</b>
	[486] December 09, 2021	
06/14/2022	<b>Final Billing of Transcript</b>	<b>Doc ID# 508</b>
	[508] April 06, 2022; December 09, 2021	
06/14/2022	<b>Receipt of Copy</b>	<b>Doc ID# 509</b>
	[509] April 06, 2021; December 09, 2021	
06/14/2022	<b>Final Billing of Transcript</b>	<b>Doc ID# 511</b>
	[511] March 12, 2021; August 12, 2021	
06/14/2022	<b>Receipt of Copy</b>	<b>Doc ID# 512</b>
	[512] March 12, 2021; August 12, 2021	
06/29/2022	<b>Findings of Fact, Conclusions of Law and Judgment</b>	<b>Doc ID# 487</b>
	[487] Findings of Fact Conclusions of Law and Order Denying Motion to Stay Order for Removal of Guardian	
07/06/2022	<b>Notice of Entry of Order</b>	<b>Doc ID# 488</b>
	[488] 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)	
07/20/2022	<b>Notice of Hearing</b>	<b>Doc ID# 489</b>
	[489] Notice of Hearing on Petition for Authority to Sell the Protected Person's Real Property	
07/20/2022	<b>Petition</b>	<b>Doc ID# 490</b>
	[490] Petition for Authority to Sell the Protected Person's Real Property	
07/26/2022	<b>Errata</b>	<b>Doc ID# 491</b>
	[491] Certification of Notification April 06, 2021; December 09, 2021	
07/26/2022	<b>Errata</b>	<b>Doc ID# 505</b>
	[505] CERTIFICATION OF TRANSCRIPT/NOTIFICATION OF COMPLETION April 06, 2021; December 09, 2021	
07/28/2022	<b>Petition</b>	<b>Doc ID# 492</b>
	[492] Petition to Remove Legal Aid Center of Southern Nevada; Or, in the Alternative, to Limit the Scope of Court-Appointed Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for Advice and Instructions Concerning Using Funds to Pay for Legal Services	
07/28/2022	<b>Notice of Hearing</b>	<b>Doc ID# 493</b>
	[493] Notice of Hearing on Petition to Remove Legal Aid Center of Southern Nevada; Or, in the Alternative, to Limit the Scope of Court-Appointed Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for Advice and Instructions Concerning Using Funds to Pay for Legal Services	
08/03/2022	<b>Notice of Hearing</b>	<b>Doc ID# 494</b>
	[494] Notice of Hearing on Petition for Authority to Sell the Protected Person's Real Property	
08/03/2022	<b>Clerk's Notice of Hearing</b>	<b>Doc ID# 495</b>
	[495] Clerks Notice of Hearing	
08/03/2022	<b>Certificate of Service</b>	<b>Doc ID# 496</b>
	[496] Certificate of Service	
08/08/2022	<b>Ex Parte Petition</b>	<b>Doc ID# 497</b>
	[497] Ex Parte Petition for an Order Shortening Time to Hear Petition for Authority to Sell the Protected Person's Real Property	
08/08/2022	<b>Affidavit of Due Diligence</b>	<b>Doc ID# 498</b>
	[498] Affidavit in Support of Ex Parte Petition for an Order Shortening Time to Hear Petition for Authority to Sell the Protected Person's Real Property	
08/10/2022	<b>Motion</b>	<b>Doc ID# 499</b>
	[499] Motion for Appointment of Counsel for Guardian Ad Litem	
08/11/2022	<b>Errata</b>	<b>Doc ID# 504</b>
	[504] RECEIPT OF COPY April 06, 2021; December 09, 2021	
08/11/2022	<b>Errata</b>	<b>Doc ID# 506</b>
	[506] FINAL BILLING April 06, 2021; December 09, 2021	
08/12/2022	<b>Clerk's Notice of Hearing</b>	<b>Doc ID# 500</b>
	[500] Notice of Hearing	
08/15/2022	<b>Order Granting</b>	<b>Doc ID# 501</b>
	[501] Order Granting OST on Petition for Instructions	
08/15/2022	<b>Objection</b>	<b>Doc ID# 502</b>
	[502] Partial Objection To Petition To Remove Legal Aid Center Of Southern Nevada; Or, In The Alternative, To Limit The Scope Of Court Appointed Counsel; Petition To Reappoint The Guardian Ad Litem; Petition For Instructions Concerning Using Funds To Pay For Legal Services	

08/15/2022	<b>Notice of Entry</b> <b>Doc ID# 503</b> <i>[503] Notice of Entry of Order</i>
08/17/2022	<b>Exhibits</b> <b>Doc ID# 507</b> <i>[507] Exhibits</i>
08/24/2022	<b>Hearing</b> (10:00 AM) (Judicial Officer Marquis, Linda) <i>Hearing for Petition for Authority to Sell</i> <u>Parties Present</u> <i>09/08/2022 Reset by Court to 08/24/2022</i> Result: Matter Continued
09/01/2022	<b>Opposition</b> <b>Doc ID# 513</b> <i>[513] OPPOSITION TO MOTION FOR APPOINTMENT OF COUNSEL FOR GUARDIAN AD LITEM</i>
09/02/2022	<b>Reply</b> <b>Doc ID# 514</b> <i>[514] Reply to Partial Objection to Petition to Remove Legal Aid Center of Southern Nevada; Or, In the Alternative, to Limit the Scope of Court Appointed Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for Instructions Concerning Using Funds to Pay for Legal Services</i>
09/06/2022	<b>Certificate of Service</b> <b>Doc ID# 515</b> <i>[515] Certificate of Service</i>
09/07/2022	<b>Exhibits</b> <b>Doc ID# 516</b> <i>[516] Exhibits to: Petition for Authority to Sell the Protected Person's Real Property</i>
09/08/2022	<b>Petition</b> (1:00 PM) (Judicial Officer Marquis, Linda) <i>[492] Petition to Remove Legal Aid Center of Southern Nevada; Or, in the Alternative, to Limit the Scope of Court-Appointed Counsel; Petition to Reappoint the Guardian Ad Litem; Petition for Advice and Instructions Concerning Using Funds to Pay for Legal Services</i> Result: Deferred Ruling
09/08/2022	<b>Hearing</b> (1:00 PM) (Judicial Officer Marquis, Linda) <i>Petition for Authority to Sell (continued from 8/24/22 to be heard with pending Petition)</i> Result: Granted
09/08/2022	<b>All Pending Motions</b> (1:00 PM) (Judicial Officer Marquis, Linda) <u>Parties Present</u> Result: Matter Heard
09/19/2022	<b>Reply</b> <b>Doc ID# 517</b> <i>[517] Reply to Opposition to Motion for Appointment of Counsel for Guardian Ad Litem</i>
09/22/2022	<b>Motion</b> (10:30 AM) (Judicial Officer Marquis, Linda) <i>Motion for Appointment of Counsel for Guardian Ad Litem</i>

## FINANCIAL INFORMATION

<b>Attorney Michaelson, John P.</b>			
Total Financial Assessment			24.00
Total Payments and Credits			24.00
<b>Balance Due as of 09/20/2022</b>			<b>0.00</b>
12/09/2021	Transaction Assessment		6.00
12/13/2021	Online Payment	Receipt # 2021-75536-CCCLK	Public Copy Request (6.00)
09/06/2022	Transaction Assessment		11.00
09/06/2022	Online Payment	Receipt # 2022-51522-CCCLK	Public Copy Request (11.00)
09/13/2022	Transaction Assessment		7.00
09/13/2022	Online Payment	Receipt # 2022-53177-CCCLK	Public Copy Request (7.00)
<b>Attorney Parra-Sandoval, Maria L.</b>			
Total Financial Assessment			385.00
Total Payments and Credits			385.00
<b>Balance Due as of 09/20/2022</b>			<b>0.00</b>
06/01/2021	Payment (Phone)	Receipt # 2021-08387-FAM	Parra-Sandoval, Maria L. (90.00)
04/01/2022	Transaction Assessment		82.50
04/01/2022	Transaction Assessment		7.50
05/24/2022	Online Payment	Receipt # 2022-29870-CCCLK	Legal Aid Center of Southern Nevada (295.00)
06/08/2022	Transaction Assessment		295.00
<b>Guardian of Person and Estate Friedman, Robyn</b>			
Total Financial Assessment			225.00
Total Payments and Credits			225.00
<b>Balance Due as of 09/20/2022</b>			<b>0.00</b>
09/25/2019	Transaction Assessment		20.00
09/25/2019	Payment (Window)	Receipt # 2019-27289-FAM	Michaelson, John P. (20.00)
10/04/2019	Transaction Assessment		10.00
10/04/2019	Payment (Window)	Receipt # 2019-28220-FAM	Michaelson, John P. (10.00)
12/05/2019	Transaction Assessment		25.00
12/05/2019	Payment (Window)	Receipt # 2019-33627-FAM	Luszeck, Jeffrey P. (25.00)
12/09/2019	Transaction Assessment		150.00
12/09/2019	Payment (Window)	Receipt # 2019-33853-FAM	Solomon Dwiggins & Freer, LTD. (150.00)
01/11/2022	Transaction Assessment		20.00
01/11/2022	Payment (Window)	Receipt # 2022-00457-FAM	Michaelson, John P. (20.00)

<b>Guardian of Person and Estate Jones, Kimberly</b>				
Total Financial Assessment				338.00
Total Payments and Credits				334.50
<b>Balance Due as of 09/20/2022</b>				<b>3.50</b>
10/02/2019	Transaction Assessment			80.00
10/02/2019	Efile Payment	Receipt # 2019-60217-CCCLK	Jones, Kimberly	(80.00)
11/22/2019	Transaction Assessment			3.50
11/22/2019	Efile Payment	Receipt # 2019-71026-CCCLK	Jones, Kimberly	(3.50)
12/02/2019	Transaction Assessment			3.50
12/02/2019	Efile Payment	Receipt # 2019-72181-CCCLK	Jones, Kimberly	(3.50)
12/03/2019	Transaction Assessment			3.50
12/03/2019	Efile Payment	Receipt # 2019-72381-CCCLK	Jones, Kimberly	(3.50)
12/03/2019	Transaction Assessment			3.50
12/03/2019	Efile Payment	Receipt # 2019-72401-CCCLK	Jones, Kimberly	(3.50)
12/09/2019	Transaction Assessment			3.50
12/09/2019	Efile Payment	Receipt # 2019-73500-CCCLK	Jones, Kimberly	(3.50)
12/09/2019	Transaction Assessment			3.50
12/09/2019	Efile Payment	Receipt # 2019-73510-CCCLK	Jones, Kimberly	(3.50)
12/13/2019	Transaction Assessment			6.00
12/13/2019	Payment (Window)	Receipt # 2019-74803-CCCLK	Jones, Kimberly	(6.00)
01/29/2020	Transaction Assessment			28.00
01/29/2020	Payment (Window)	Receipt # 2020-05852-CCCLK	Jones, Kimberly	(28.00)
02/06/2020	Transaction Assessment			3.50
02/06/2020	Efile Payment	Receipt # 2020-07745-CCCLK	Jones, Kimberly	(3.50)
02/07/2020	Transaction Assessment			3.50
02/07/2020	Efile Payment	Receipt # 2020-07939-CCCLK	Jones, Kimberly	(3.50)
02/07/2020	Transaction Assessment			3.50
02/07/2020	Efile Payment	Receipt # 2020-07948-CCCLK	Jones, Kimberly	(3.50)
02/21/2020	Transaction Assessment			3.50
02/21/2020	Efile Payment	Receipt # 2020-10910-CCCLK	Jones, Kimberly	(3.50)
03/03/2020	Transaction Assessment			3.50
03/03/2020	Efile Payment	Receipt # 2020-13171-CCCLK	Jones, Kimberly	(3.50)
03/31/2020	Transaction Assessment			3.50
03/31/2020	Efile Payment	Receipt # 2020-18483-CCCLK	Jones, Kimberly	(3.50)
04/14/2020	Transaction Assessment			3.50
04/14/2020	Efile Payment	Receipt # 2020-20374-CCCLK	Jones, Kimberly	(3.50)
04/27/2020	Transaction Assessment			3.50
04/27/2020	Efile Payment	Receipt # 2020-22232-CCCLK	Jones, Kimberly	(3.50)
04/27/2020	Transaction Assessment			3.50
04/27/2020	Efile Payment	Receipt # 2020-22375-CCCLK	Jones, Kimberly	(3.50)
05/08/2020	Transaction Assessment			3.50
05/08/2020	Efile Payment	Receipt # 2020-25121-CCCLK	Jones, Kimberly	(3.50)
05/14/2020	Transaction Assessment			3.50
05/14/2020	Efile Payment	Receipt # 2020-26153-CCCLK	Jones, Kimberly	(3.50)
05/21/2020	Transaction Assessment			3.50
05/21/2020	Efile Payment	Receipt # 2020-27631-CCCLK	Jones, Kimberly	(3.50)
05/29/2020	Transaction Assessment			3.50
05/29/2020	Efile Payment	Receipt # 2020-28734-CCCLK	Jones, Kimberly	(3.50)
06/10/2020	Transaction Assessment			3.50
06/10/2020	Efile Payment	Receipt # 2020-31023-CCCLK	Jones, Kimberly	(3.50)
06/25/2020	Transaction Assessment			3.50
06/25/2020	Efile Payment	Receipt # 2020-33847-CCCLK	Jones, Kimberly	(3.50)
07/22/2020	Transaction Assessment			3.50
07/22/2020	Efile Payment	Receipt # 2020-39925-CCCLK	Jones, Kimberly	(3.50)
08/18/2020	Transaction Assessment			3.50
08/18/2020	Efile Payment	Receipt # 2020-45689-CCCLK	Jones, Kimberly	(3.50)
10/27/2020	Transaction Assessment			3.50
10/27/2020	Efile Payment	Receipt # 2020-60813-CCCLK	Jones, Kimberly	(3.50)
11/12/2020	Transaction Assessment			3.50
12/10/2020	Transaction Assessment			3.50
12/10/2020	Efile Payment	Receipt # 2020-69671-CCCLK	Jones, Kimberly	(3.50)
12/21/2020	Transaction Assessment			3.50
12/21/2020	Efile Payment	Receipt # 2020-71706-CCCLK	Jones, Kimberly	(3.50)
01/25/2021	Transaction Assessment			3.50
01/25/2021	Efile Payment	Receipt # 2021-04561-CCCLK	Jones, Kimberly	(3.50)
02/03/2021	Transaction Assessment			3.50
02/03/2021	Efile Payment	Receipt # 2021-06566-CCCLK	Jones, Kimberly	(3.50)
02/08/2021	Transaction Assessment			3.50
02/08/2021	Efile Payment	Receipt # 2021-07392-CCCLK	Jones, Kimberly	(3.50)
02/08/2021	Transaction Assessment			3.50
02/08/2021	Efile Payment	Receipt # 2021-07619-CCCLK	Jones, Kimberly	(3.50)
03/01/2021	Transaction Assessment			3.50
03/01/2021	Efile Payment	Receipt # 2021-11714-CCCLK	Jones, Kimberly	(3.50)
03/12/2021	Transaction Assessment			3.50
03/12/2021	Efile Payment	Receipt # 2021-14856-CCCLK	Jones, Kimberly	(3.50)
03/16/2021	Transaction Assessment			3.50
03/16/2021	Efile Payment	Receipt # 2021-15417-CCCLK	Jones, Kimberly	(3.50)
03/18/2021	Transaction Assessment			3.50
03/18/2021	Efile Payment	Receipt # 2021-16331-CCCLK	Jones, Kimberly	(3.50)
03/26/2021	Transaction Assessment			3.50
03/26/2021	Efile Payment	Receipt # 2021-18427-CCCLK	Jones, Kimberly	(3.50)
03/29/2021	Transaction Assessment			3.50
03/29/2021	Efile Payment	Receipt # 2021-18578-CCCLK	Jones, Kimberly	(3.50)

03/30/2021	Transaction Assessment			3.50
03/30/2021	Efile Payment	Receipt # 2021-19237-CCCLK	Jones, Kimberly	(3.50)
03/31/2021	Transaction Assessment			3.50
03/31/2021	Efile Payment	Receipt # 2021-19464-CCCLK	Jones, Kimberly	(3.50)
04/02/2021	Transaction Assessment			3.50
04/02/2021	Efile Payment	Receipt # 2021-20063-CCCLK	Jones, Kimberly	(3.50)
04/09/2021	Transaction Assessment			3.50
04/09/2021	Efile Payment	Receipt # 2021-21995-CCCLK	Jones, Kimberly	(3.50)
04/26/2021	Transaction Assessment			3.50
04/26/2021	Efile Payment	Receipt # 2021-25707-CCCLK	Jones, Kimberly	(3.50)
05/03/2021	Transaction Assessment			3.50
05/03/2021	Efile Payment	Receipt # 2021-27305-CCCLK	Jones, Kimberly	(3.50)
05/05/2021	Transaction Assessment			3.50
05/05/2021	Efile Payment	Receipt # 2021-28011-CCCLK	Jones, Kimberly	(3.50)
05/11/2021	Transaction Assessment			3.50
05/11/2021	Efile Payment	Receipt # 2021-29395-CCCLK	Jones, Kimberly	(3.50)
05/17/2021	Transaction Assessment			3.50
05/17/2021	Efile Payment	Receipt # 2021-30457-CCCLK	Jones, Kimberly	(3.50)
05/17/2021	Transaction Assessment			3.50
05/17/2021	Efile Payment	Receipt # 2021-30507-CCCLK	Jones, Kimberly	(3.50)
05/25/2021	Transaction Assessment			3.50
05/25/2021	Efile Payment	Receipt # 2021-32449-CCCLK	Jones, Kimberly	(3.50)
06/02/2021	Transaction Assessment			3.50
06/02/2021	Efile Payment	Receipt # 2021-34449-CCCLK	Jones, Kimberly	(3.50)
06/03/2021	Transaction Assessment			3.50
06/03/2021	Efile Payment	Receipt # 2021-34824-CCCLK	Jones, Kimberly	(3.50)
06/07/2021	Transaction Assessment			3.50
06/07/2021	Efile Payment	Receipt # 2021-35232-CCCLK	Jones, Kimberly	(3.50)
06/16/2021	Transaction Assessment			3.50
06/16/2021	Efile Payment	Receipt # 2021-37482-CCCLK	Jones, Kimberly	(3.50)
06/16/2021	Transaction Assessment			3.50
06/16/2021	Efile Payment	Receipt # 2021-37523-CCCLK	Jones, Kimberly	(3.50)
06/17/2021	Transaction Assessment			3.50
06/17/2021	Efile Payment	Receipt # 2021-38014-CCCLK	Jones, Kimberly	(3.50)
06/18/2021	Transaction Assessment			3.50
06/18/2021	Efile Payment	Receipt # 2021-38412-CCCLK	Jones, Kimberly	(3.50)
07/26/2021	Transaction Assessment			3.50
07/26/2021	Efile Payment	Receipt # 2021-46323-CCCLK	Jones, Kimberly	(3.50)
07/26/2021	Transaction Assessment			3.50
07/26/2021	Efile Payment	Receipt # 2021-46324-CCCLK	Jones, Kimberly	(3.50)
08/09/2021	Transaction Assessment			3.50
08/09/2021	Efile Payment	Receipt # 2021-49427-CCCLK	Jones, Kimberly	(3.50)
08/09/2021	Transaction Assessment			3.50
08/09/2021	Efile Payment	Receipt # 2021-49434-CCCLK	Jones, Kimberly	(3.50)
08/17/2021	Transaction Assessment			3.50
08/17/2021	Efile Payment	Receipt # 2021-51096-CCCLK	Jones, Kimberly	(3.50)
08/30/2021	Transaction Assessment			3.50
08/30/2021	Efile Payment	Receipt # 2021-54105-CCCLK	Jones, Kimberly	(3.50)
09/16/2021	Transaction Assessment			3.50
09/16/2021	Efile Payment	Receipt # 2021-57612-CCCLK	Jones, Kimberly	(3.50)
09/16/2021	Transaction Assessment			3.50
09/16/2021	Efile Payment	Receipt # 2021-57618-CCCLK	Jones, Kimberly	(3.50)
12/10/2021	Transaction Assessment			3.50
12/10/2021	Efile Payment	Receipt # 2021-75368-CCCLK	Jones, Kimberly	(3.50)

**Other** Public Copy Request  
Total Financial Assessment  
Total Payments and Credits  
**Balance Due as of 09/20/2022**

18.50  
18.50  
**0.00**

09/09/2022	Transaction Assessment			18.50
09/09/2022	Online Payment	Receipt # 2022-52253-CCCLK	Public Copy Request	(18.50)

**Other** Yeoman, Rodney Gerald  
Total Financial Assessment  
Total Payments and Credits  
**Balance Due as of 09/20/2022**

104.00  
104.00  
**0.00**

10/01/2019	Transaction Assessment			80.00
10/01/2019	Efile Payment	Receipt # 2019-59847-CCCLK	Yeoman, Rodney Gerald	(80.00)
06/26/2020	Transaction Assessment			24.00
06/26/2020	Efile Payment	Receipt # 2020-33979-CCCLK	Yeoman, Rodney Gerald	(24.00)

**Protected Person** Jones, Kathleen June  
Total Financial Assessment  
Total Payments and Credits  
**Balance Due as of 09/20/2022**

1,539.25  
1,539.25  
**0.00**

12/23/2019	Transaction Assessment			3.50
12/23/2019	Efile Payment	Receipt # 2019-76531-CCCLK	Jones, Kathleen June	(3.50)
12/23/2019	Transaction Assessment			3.50
12/23/2019	Efile Payment	Receipt # 2019-76537-CCCLK	Jones, Kathleen June	(3.50)
09/11/2020	Transaction Assessment			24.00
09/11/2020	Fee Waiver			(24.00)
06/03/2021	Transaction Assessment			24.00
06/03/2021	Fee Waiver			(24.00)
12/15/2021	Transaction Assessment			24.00
12/15/2021	Fee Waiver			(24.00)
12/21/2021	Online Payment	Receipt # 2021-77440-CCCLK	Legal Aid Center of Southern Nevada	(1,265.00)
01/13/2022	Transaction Assessment			3.50
01/13/2022	Efile Payment	Receipt # 2022-02438-CCCLK	Jones, Kathleen June	(3.50)
02/04/2022	Transaction Assessment			70.00
02/04/2022	Online Payment	Receipt # 2022-07228-CCCLK	Legal Aid Center of Southern Nevada	(70.00)
03/25/2022	Transaction Assessment			1.50
03/29/2022	Online Payment	Receipt # 2022-18991-CCCLK	Legal Aid Center of Southern Nevada	(1.50)
04/11/2022	Transaction Assessment			1,003.75
04/11/2022	Transaction Assessment			261.25
04/28/2022	Transaction Assessment			24.00
04/28/2022	Fee Waiver			(24.00)
05/12/2022	Transaction Assessment			90.00
05/23/2022	Payment (Mail)	Receipt # 2022-08653-FAM	Jones, Kathleen June	(90.00)
06/14/2022	Transaction Assessment			6.25
06/15/2022	Online Payment	Receipt # 2022-33841-CCCLK	Legal Aid Center of Southern Nevada	(6.25)