

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; DONNA
SIMMONS; AND ELIZABETH
BRICKFIELD, GUARDIAN AD LITEM
FOR KATHLEEN JUNE JONES,

Respondents.

No. 84655

Electronically Filed
Oct 12 2022 05:30 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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

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

Respondents' answering brief and appendix were originally due October 17, 2022. This is Respondents' first motion for extension of time. No request for additional time has been denied or denied in part. If this Court grants this request for an extension of 30 days, Respondents'

answering brief and appendix will be due on Wednesday, November 16, 2022.

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

1. Respondents need to respond to Appellant's Opening Brief.
2. Respondents may need to prepare their own appendix to demonstrate the full proceedings in the District Court in support of an Answering Brief from them.
3. Respondent, Elizabeth Brickfield, was granted an extension on her Answering Brief until November 16, 2022.
4. This case was highly contentious and detailed on the issues, including the appropriateness of this appeal. Respondents are currently arguing against another appeal made by Appellants against Respondents (Docket #83967) and need additional time to argue on multiple fronts against Appellants.
5. Finally, one of the Attorneys on the case, Mr. Peter R. Pratt, Esq. is going in for a scheduled surgery on October 17th. His ability to contribute to the answering brief will be limited as he has been preparing for the surgery for weeks now by managing his caseload and does not

have the needed time to fully research, draft, contribute to and present arguments against this appeal. Additional time is requested for him to have surgery and recover before finalizing an Answering Brief.

This motion is submitted in good faith and for good cause shown in accordance with NRAP 31(b). For the foregoing reason, Respondents respectfully request a 30-day extension of time, until Wednesday, November 16, 2022, within which to file their Answering Brief and possibly an appendix.

Dated this 12th day of October 2022.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' ANSWERING BRIEF AND APPENDIX (First Request)* with the Nevada Supreme Court on the 12th day of October 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

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