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2 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

3 IN THE MATTER OF THE  
4 GUARDIANSHIP OF THE PERSON  
5 AND ESTATE OF KATHLEEN JUNE  
6 JONES, PROTECTED PERSON,

7 KATHLEEN JUNE JONES

8 Appellant,

9 vs.

10 ROBYN FRIEDMAN; DONNA  
11 SIMMONS; AND ELIZABETH  
12 BRICKFIELD, GUARDIAN AD LITEM  
13 FOR KATHLEEN JUNE JONES,

14 Respondents.

) Supreme Court Case No. 84655

) District Court Case No. G-19-052263-A  
) Electronically Filed  
) Dec 07 2022 02:56 PM  
) Elizabeth A. Brown  
) Clerk of Supreme Court

15 **MOTION OF STATE BAR OF NEVADA- PROBATE AND TRUST SECTION**  
16 **FOR EXTENSION OF TIME TO FILE AMICUS CURIAE BRIEF**

17 COMES NOW, the Probate and Trust Section of the State Bar of Nevada (“the  
18 Section”), by and through its Chair, Julia S. Gold, Esq. of the Law Offices of Julia S.  
19 Gold, P.C. and pursuant to NRAP 31(b)(3) and 29(f), and moves this Honorable Court  
20 for an extension of time to file its amicus curiae brief (“the Brief”) from December 7,  
21 2022, to January 30, 2023.

22 Pursuant to NRAP 29(f), the amicus curiae must file its brief, accompanied by  
23 a motion for filing, no later than 7 days after the brief of the party being supported is  
24 filed. The party being supported is the Respondents who filed their brief on November  
25 16, 2022. Therefore, the amicus curiae of the Section was due on November 23, 2022.  
26 The Section received a fourteen (14) day telephonic extension on November 16, 2022,  
27 making the Brief due on December 7, 2022. The Section must abide by the State Bar  
28 rules and seek approval from the State Bar of Nevada Board of Governors (SBN) of the  
drafted brief prior to filing it. At this time, the Section has not received approval from  
the SBN and requests this Court allow for an extension of time to provide time to the  
SBN to review and approve the Section’s Brief.

1           NRAP 31(b)(3) allows a party to extend their time for filing beyond the due dates  
2 set forth in NRAP 31(a)(1) by filing a motion for extension of time. Additionally NRAP  
3 31 states that a motion for extension of time may be made no later than the due date of  
4 the brief. As the Section's Brief is due December 7, 2022, this Motion is timely. NRAP  
5 29(f) also states that the court may grant leave for later filing of an amicus brief. The  
6 Section therefore submits this Motion asking for an extension of time to file the Brief,  
7 to be due on or after January 30, 2023.

8           The relief for the requested extension of time is based upon the following:

9           1. The Section's bylaws require the Section to authorize an amicus curiae brief  
10 before its' filing. Then, the SBN must approve the filing of an amicus curiae brief.

11           2. Due to the holidays and the need for collaboration from the Section, the Brief  
12 was not submitted to the SBN for approval until December 5, 2022.

13           3. The Section was granted a telephonic extension until December 7, 2022 to file  
14 the Brief; however, additional time is needed.

15           4. At this time, the SBN has not approved the draft of the amicus brief submitted,  
16 and has requested that the Section seek an extension of time to provide the SBN time to  
17 hold a board discussion. *See* E-mail Request from Executive Director Kimberly Farmer  
18 attached as Exhibit 1.

19           5. Additionally, the SBN has requested an extension to January 30, 2023 to  
20 allow the Board of Governors time to review the brief, suggest changes if the Board  
21 deems it necessary, then allow the Section time to make the changes and resubmit for  
22 approval. *See* E-mail Request from Executive Director Kimberly Farmer to Julia Gold  
23 attached as Exhibit 2.

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1           The Section respectfully requests that this Court grant the requested extension,  
2 which would make the amicus curiae brief due on January 30, 2023.

3                           Dated this 7<sup>th</sup> day of December, 2022.

4                           **PROBATE AND TRUST LAW SECTION**  
5                           **OF THE NEVADA STATE BAR**

6                           /s/ Julia S. Gold

7                           Julia S. Gold, Esq.  
8                           Chairperson for the State Bar of Nevada  
9                           Probate and Trust Law Section  
10                          LAW OFFICES OF JULIA S. GOLD  
11                          Nevada Bar No. 6991  
12                          641 Humboldt Street  
13                          Reno, Nevada 89509  
14                          Telephone: (775) 826-5599  
15                          Email: [julia@juliagoldlaw.com](mailto:julia@juliagoldlaw.com)

16                          /s/ Dara J. Goldsmith

17                          Dara J. Goldsmith, Esq.  
18                          Amicus Curiae Chairperson for the State Bar  
19                          of Nevada Probate and Trust Law Section  
20                          GOLDSMITH & GUYMON, P.C.  
21                          Nevada Bar No. 4270  
22                          2055 Village Center Circle  
23                          Las Vegas, Nevada 89134  
24                          Telephone: (702) 873-9500  
25                          Email: [dgoldsmith@goldguylaw.com](mailto:dgoldsmith@goldguylaw.com)

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**EXHIBIT 1**

E-mail Request from Executive Director Kimberly Farmer to Julia Gold

**From:** Kimberly Farmer <[KimberlyF@nvbar.org](mailto:KimberlyF@nvbar.org)>  
**Sent:** Tuesday, December 6, 2022 1:36 PM  
**To:** Julia Gold <[julia@juliagoldlaw.com](mailto:julia@juliagoldlaw.com)>  
**Cc:** Armeni, Paola M. <[parmeni@clarkhill.com](mailto:parmeni@clarkhill.com)>; [doug@jdouglasclark.com](mailto:doug@jdouglasclark.com); Robert Horne <[rhorne@nvbar.org](mailto:rhorne@nvbar.org)>  
**Subject:** Amicus Request - Probate & Trust

Good afternoon Julia,

We ask the section to seek an extension of time to file the attached amicus brief. There are some areas of concern with the brief that will require a Board Discussion and additional input from the section. Unfortunately, more time is required to provide the section with this additional guidance and comment on the areas of concern.

I am available to provide additional information or to answer any questions. Thank you in advance for allowing the Board to properly review the brief.

Have a nice day.

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**EXHIBIT 2**

E-mail Request from Executive Director Kimberly Farmer to Julia Gold

**From:** Kimberly Farmer <[KimberlyF@nvbar.org](mailto:KimberlyF@nvbar.org)>  
**Date:** December 7, 2022 at 8:24:04 AM PST  
**To:** Julia Gold <[julia@juliagoldlaw.com](mailto:julia@juliagoldlaw.com)>  
**Cc:** "Armeni, Paola M." <[parmeni@clarkhill.com](mailto:parmeni@clarkhill.com)>, [doug@idougiasclark.com](mailto:doug@idougiasclark.com)  
**Subject:** FW: Amicus Request - Probate & Trust

Good morning Julia,

If possible, an extension to January 30, 2023 would allow the Board of Governors time to review the brief, suggest changes (if necessary), and allow the section time to make the changes.

I am available to provide additional information.

Have a nice day.



Kimberly Farmer  
Executive Director  
702.317.1400

Visit us at [www.nvbar.org](http://www.nvbar.org)