

IN THE SUPREME COURT FOR 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; AND ELIZABETH
BRICKFIELD, GUARDIAN AD LITEM FOR
KATHLEEN JUNE JONES,

Respondents.

Supreme Court No. 84655

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Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR LEAVE TO FILE A RESPONSE TO THE PROBATE
AND TRUST SECTION OF THE STATE BAR OF NEVADA'S
MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF UNDER
NRAP 29(C)**

Kathleen June Jones ("June" or "Appellant"), Appellant, by and through counsel, Barbara Buckley, Esq., Scott Cardenas, Esq., and Elizabeth Mikesell, Esq., of Legal Aid Center Of Southern Nevada, Inc., respectfully move this Court, pursuant to NRAP 27 and NRAP 29(f) for leave to file a Response to the Probate and Trust Section of the State Bar of Nevada's Motion for Leave to File Amicus Curiae Brief Under NRAP 29(c).

NRAP 29(f) provides that in granting leave for a later filing of the motion for leave to file an amicus brief, the court may specify “the time within which an opposing party may answer.” Moreover, because the Section asked for lengthy extensions that placed the due date for their motion well after the time that briefing was completed, June must now request leave to file a response to their motion to file an amicus brief. At the time that the Section asked for extensions, it was not clear yet whether the State Bar of Nevada Board of Governor’s would even approve the amicus brief. Thus, the need to now request leave to file a response was not due to any delay on June’s part.

The State Bar of Nevada Board of Governor’s vote took place on January 19, 2023, and June’s counsel was informed on January 20, 2023 that the Board of Governor’s approved the Section’s request to file an amicus brief. Because the amicus brief discusses issues entirely separate from those on appeal and makes several ad hominem attacks against June’s counsel, leave is now being requested to file a response to the motion for leave to file an amicus brief. For the sake of expediting this matter, June has attached to this motion her Response to the Probate and Trust Section of the State Bar of Nevada’s Motion for

Leave to File Amicus Curiae Brief Under NRAP 29(c). *See* Response attached hereto as **Exhibit 1**. June should have an opportunity to respond to the Section's request to get involved as an amicus curiae, especially considering that the Section makes several consequential arguments that are irrelevant to the issues in this appeal.

This motion is submitted in good faith and for good cause shown. For the foregoing reasons, Appellant respectfully requests leave to file her Response to the Probate and Trust Section of the State Bar of Nevada's Motion for Leave to File Amicus Brief Under NRAP 29(c).

DATED this 1st day of February, 2023.

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

/s/ Barbara Buckley, Esq.

Barbara Buckley, Esq.

Nevada Bar No. 3918

Scott Cardenas, Esq.

Nevada Bar No. 14851

Elizabeth Mikesell, Esq.

Nevada Bar No. 08034

725 E. Charleston Blvd

Las Vegas, NV 89104

Telephone: (702) 386-1539

scardenas@lacsnsn.org

Attorneys for Appellant

CERTIFICATE OF SERVICE

I certify that on 1st day of February, 2023, I submitted the foregoing **MOTION FOR LEAVE TO FILE A RESPONSE** for filing through the Court's electronic filing system. Electronic notification of service will be sent to the following:

Elizabeth Mikesell, Las Vegas, NV, as counsel for Appellant
Scott Cardenas, Las Vegas, NV, as counsel for Appellant
Jeffrey Sylvester, Las Vegas, NV, as counsel for Respondent
John Michaelson, Henderson, NV, as counsel for Respondent
Elizabeth Brickfield
Dara J. Goldsmith
Ammon Francom

I further certify that on the 1st day of February, 2023, I served a copy of this document by mailing a true and correct copy thereof, postage prepared, to the following:

Julia S. Gold, Esq.
Law offices of Julia S. Gold
641 Humboldt Street
Reno, Nevada 89509

/s/ Jennifer Bocek-Dobijanski
An employee of Legal Aid Center
of Southern Nevada