

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

2
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 **Electronically Filed**
Case No. 84655 **Aug 14 2023 04:10 PM**
Elizabeth A. Brown
District Court **Clerk of Supreme Court**
Case No. G-19-052263-A

15 **MOTION OF STATE BAR OF NEVADA- PROBATE AND TRUST SECTION**
16 **UNDER NRAP 29(H) FOR ORAL ARGUMENT**

17 COMES NOW, the Probate and Trust Section of the State Bar of Nevada (“the Section”), by
18 and through its Chair, Julia S. Gold, Esq., of the law offices of Julia S. Gold, P.C. and pursuant to
19 NRAP 29(h) requests that the Section be allowed oral argument before the Court for further
20 amplification of the legal issues addressed in its Amicus Curiae Brief and alleges as follows:

- 21 1. Appellant’s Opening Brief and Appellant’s Appendix was filed on September 15, 2022.
- 22 2. The Respondent’s Brief was filed on November 16, 2022.
- 23 3. The Appellant’s Reply Brief was filed on December 15, 2022.
- 24 4. The Section’s Motion to File Amicus Curiae Brief Under NRAP 29(c) was filed on January
25 30, 2023, and the Order Granting the Motion to File the Amicus Curiae Brief was filed on
26 February 17, 2023.
- 27 5. The Order Scheduling Oral Argument was filed on August 10, 2023 wherein oral argument
28 has been scheduled for September 13, 2023 at 10:30 a.m.

6. NRAP Rule 29(h) states that “an amicus may file a motion to participate in oral argument, but the court will grant such motions only for extraordinary reasons.” Pursuant to this rule, the Section requests permission to participate in oral argument.
7. The Section feels that allowing the amicus to participate in oral argument in this matter is important as the Section’s practice of law relates to the current matter and the decision made through this matter could impact the future of any attorney serving as a guardian ad litem.
8. The legal issues presented in this matter could materially affect the legal practice for many attorneys including probate, trust and estate planning attorneys, as well as negatively impact the best interests of [Proposed] Protected Person[s] and the Section has a strong interest in the matter.
9. This matter involves nuanced legal issues concerning the roles of an attorney for a Protected Person and that of a guardian ad litem. Any decision by this Court will significantly impact the attorneys that practice in this area and are members of the Probate and Trust Section.
10. For these reasons, the Section believes it is imperative that a representative is present at the oral argument to be able to address any questions that may arise concerning the nuanced legal issues.
11. In the event that the Court is not inclined to grant the Section oral argument, the Section requests the ability to be available to answer questions that the Court may have for the Section.

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1 WHEREFORE, the Probate and Trust Section of the State Bar of Nevada, as amicus curiae,
2 requests that it be allowed oral argument before the Court; or in the alternative to be available to address
3 any questions the Court may have for the Section.

4 DATED this 14th day of August, 2023.

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7 **PROBATE AND TRUST LAW SECTION**
8 **OF THE NEVADA STATE BAR**

9 /s/ Julia S. Gold

10 Julia S. Gold, Esq.
11 Chair Person for the State Bar of Nevada
12 Probate and Trust Law Section
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/s/ Dara J. Goldsmith

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