

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT COURT

IN THE MATTER OF THE ESTATE OF: ELIZABETH WILLIAMS NAYLOR, Deceased

Case Number: D-202-PB-201100653

The Honorable Joshua A. Allison

MOTION TO CONTINUE HEARING SET FOR AUGUST 12, 2025

COMES NOW, Elizabeth Ann Naylor Owens (a/k/a Jan Black Owens), a party entitled to notice in the above-captioned matter, and respectfully requests that the Court continue the hearing currently scheduled for August 12, 2025 at 11:00 a.m., before the Honorable Joshua A. Allison.

In support of this Motion, I state as follows:

1. I am currently unrepresented and actively seeking legal counsel to assist me in this matter.
2. In addition to seeking legal representation, I serve as the primary caregiver for my 79-year-old husband, who has lived with Parkinson's Disease for the past 24 years and is currently facing increasing health challenges. These responsibilities have made it difficult to properly prepare for the hearing or to meaningfully participate in the legal proceedings without counsel.
3. The hearing scheduled for August 12, 2025, involves complex legal issues—including the Petition for Withdrawal and Substitution of Counsel, as well as various Objections—that may significantly impact my rights and interests. Given the nature of these issues, I believe that having adequate legal representation is essential to ensure fairness and to promote judicial efficiency.
4. This request is made in good faith, not for the purpose of delay, and no party will be prejudiced by a brief continuance. Rather, granting additional time would help ensure due process and allow me to meaningfully participate in the proceedings.

WHEREFORE, I respectfully request that the Court grant this Motion and continue the hearing currently scheduled for August 12, 2025, by approximately 30 days, or to a date thereafter that is convenient for the Court, to allow sufficient time for me to retain counsel and prepare accordingly.

Respectfully submitted,

Elizabeth Ann Naylor Owens /s/

Elizabeth Ann Naylor Owens

a/k/a Jan Black Owens

Dated: August 3, 2025

CERTIFICATE OF SERVICE

COMES NOW, Petitioner, Elizabeth Ann Naylor Owens, and hereby certifies that on this 4th day of August, 2025, a true and correct copy of the Motion to Continue Hearing Set for August 12, 2025, was sent to Kurt Sommer and F. Vaughn Thomas via electronic mail.

Respectfully submitted,

Elizabeth Ann Naylor Owens /s/

Elizabeth Ann Naylor Owens, Petitioner, Pro Se