| 1 | IN THE SUPREME COURT OF THE STATE OF NEVADA |
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| 3 4 | JONATHAN QUISANO, Electronically Filed |
| 5 | Appellant,) Feb 18 2015 09:53 a.m. Tracie K. Lindeman |
| 6 | vs. Case Velenke Supreme Court |
| 7 | |
| 8 | THE STATE OF NEVADA, |
| 9 | Respondent.) |
| 10 | MOTION FOD I FAVE TO SUDDI EMENT ADDELL ANTES ADDENDIN |
| 11 | MOTION FOR LEAVE TO SUPPLEMENT APPELLANT'S APPENDIX |
| 12 13 | COMES NOW Appellant, JONATHAN QUISANO, by and through his |
| 13 | attorney, NORMAN J. REED, Deputy Public Defender, and moves this Honorable Court |
| 15 | for leave to Supplement Appellant's Appendix filed Friday, February 13, 2015, in the |
| 16 | above entitled case. |
| 17 | This Motion is based upon the following declaration and all papers and |
| 18 | pleadings on file herein. |
| 19 | DATED this 17 th day of February, 2015. |
| 20 | |
| 21 22 | PHILIP J. KOHN CLARK COUNTY PUBLIC DEFENDER |
| 23 | |
| 24 | |
| 25 | By <u>/s/ Norman J. Reed</u> NORMAN J. REED, #3795 |
| 26 | Deputy Public Defender 309 So. Third Street, Suite #226 |
| 27 | Las Vegas, Nevada 89155-2610 |
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| 1 | DECLARATION OF NORMAN J. REED |
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| 2 | 1. I am an attorney duly licensed to practice law in the State of Nevada and |
| 3 | the Deputy Public Defender assigned to represent Jonathan Quisano on appeal currently |
| 4 5 | pending before this Court. |
| 6 | 2. That certain documentation was omitted from the original Appellant's |
| 7 | Appendix when it was prepared and filed on the 13 th day of February, 2015. |
| 8 | |
| 9 | 3. That in order for this Court to be fully informed the document |
| 10 11 | entered as an exhibit at sentencing attached hereto as page 1543, needs to be included |
| 11 | with the Appellant's Appendix, volume VII, page 1543. This is the only page that needs |
| 13 | to be added to the appendix. |
| 14 | I declare under penalty of perjury that the foregoing is true and correct to |
| 15 | the best of my information and belief. |
| 16 | EXECUTED on the 17 th day of February, 2015. |
| 17 18 | |
| 10 | <u>/s/ Norman J. Reed</u> NORMAN J. REED |
| 20 | NORIVIAN J. KEED |
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| 1 | CERTIFICATE OF SERVICE |
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| 2 | I hereby certify that this document was filed electronically with the |
| 3 | Nevada Supreme Court on the 17 th day of February, 2015. Electronic Service of |
| 4 | the foregoing document shall be made in accordance with the Master Service List |
| 5 | as follows: |
| 6 | CATHERINE CORTEZ MASTO NORMAN J. REED |
| 7 | STEVEN S. OWENS NANCY L. LEMCKE |
| 8 | HOWARD S. BROOKS |
| 9 | I further certify that I served a copy of this document by mailing a |
| 10 | true and correct copy thereof, postage pre-paid, addressed to: |
| 11 | JONATHAN QUISANO |
| 12 | NDOC No. 1128389 c/o High Desert State Prison |
| 13 | P.O. Box 650 |
| 14 | Indian Springs, NV 89018 |
| 15 | |
| 16 | |
| 17 | |
| 18 | BY <u>/s/ Carrie M. Connolly</u> Employee, Clark County Public |
| 19 | Defender's Office |
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AFFIDAVIT

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| 2 | STATE OF NEVADA |
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| 3 | COUNTY OF CLARK) ss. |
| 4 | |
| 5 | I, Christiane Wilson-Dunlap, hereby swear (or affirm) under penalty of perjury, that the |
| 6 | following assertions are true of my own personal knowledge: |
| . 7 | 1. I am employed by the Clark County Department of Family Services and I was the |
| 8 | permanency worker assigned to subject minor K.Q. in case J330866. |
| 9 | 2. That on June 9, 2014, I requested case closure of the dependency case as to the |
| 10 | parents because the natural mother, Christina Rodrigues, articulated protective |
| 11 | capacity. Christina Rodriguez had come to recognize that K.Q.'s sibling died as a |
| 12 | result of physical abuse by the natural father, Jonathan Quisano. Christina Rodrigues |
| 13 | further expressed that Jonathan Quisano should be punished for his abuse of K.Q.'s |
| 14 | sibling and that she believed Jonathan Quisano should go to prison. |
| 15 | 3. That based on Christina Rodrigues' substantial completion of her case plan and |
| 16 | articulation of the need to protect K.Q. from Jonathan Quisano, the dependency case |
| 17 | was closed with an order giving sole physical custody to Christina Rodriguez and no |
| 18 | contact between Jonathan Quisano and K.Q. until Jonathan Quisano petitioned the |
| 19 | court for visitation and proof that he completed his case plan. FURTHER YOUR AFFIANT SAYETH NAUGHT. |
| 20 | · · · · · · · · · · · · · · · · · · · |
| 21 | Christiane Wilson-Dunlap |
| 22 | |
| 23 | SUBSCRIBED AND SWORN TO before me |
| 24 | this <u>4th</u> day of <u>September</u> 2014. by: Christiane Wilson-Dunlap |
| 25 26 | |
| 20 27 | A Am |
| 28 | NOTARY PUBLIC in and for the said |
| ~~~ | County and State of Nevada, NOTARY PUBLIC STATE OF NEVADA Appt. No. 14-12847-1 Exp. Nov. 16, 2017 |

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